

**HINKLEY POINT C PROPOSED NUCLEAR DEVELOPMENT
RESPONSE TO UPDATE ON AND PROPOSED CHANGES TO
'PREFERRED PROPOSALS' CONSULTATION**

March 2011

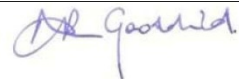


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Approval for Release Report	
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		Prepared by	Tim Durant		
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		SDC Approval	Claire Pearce		28/03/2011
		WSC Approval	Andrew Goodchild		28/03/2011

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Executive Summary

West Somerset Council and Sedgemoor District Council (the Councils) welcome the further opportunity to comment on EDF Energy's (EDFE) emerging proposals for the construction and operation of a new nuclear power station and waste storage facility at Hinkley Point C (HPC), including associated development. The EDFE Proposed Changes consultation sets out an update on and proposed changes to the Stage 2 preferred proposals and, likewise, the Councils' response set out here does not seek to repeat all matters raised previously – those points, to the extent not affected by the Proposed Changes consultation, remain relevant and outstanding. We do not consider that the material presented in this consultation addresses all of the Councils' previous comments and we are frustrated by the lack of detailed direct engagement with local planning authorities on associated development proposals.

The Councils' response is based on national, county and local policy and guidance and takes account of feedback received from local communities during the consultation period.

Adequacy of Consultation

The Councils are disappointed that there was no opportunity to comment on the emerging Proposed Changes or on some of the drafts of the supporting strategies, prior to publication, although the opportunity to comment on an initial draft of the Accommodation Strategy was appreciated. This document falls well short of what the Councils' expect to support an application, following the overarching commitment to work collaboratively with EDFE since the close of the Stage 2 consultation in October 2010, to shape proposals to deliver the agreed housing vision. The further concerns raised below in relation to adequacy of consultation were also highlighted in a response from the Councils (dated January 2011) to a draft of EDFE's revised consultation strategy (published February 2011).

Preliminary Environmental Information - The Councils are concerned that the consultation material provided in the Proposed Changes stage does not include information (including preliminary environmental information (PEI), as required under the Infrastructure (Environmental Impact Assessment) Regulations 2009) on how the Proposed Changes will impact on local communities. Unless EDFE propose to release this information for consultation prior to submission of a development consent order application, the Councils will have an outstanding concern that detailed environmental matters have not been consulted upon and solutions or mitigation measures would not have been discussed with the local community, landowners, statutory consultees and local authorities prior to submission.

Consultation Time Period - EDFE intend to carry out their Proposed Changes consultation within a 31 day period (3 days more than the statutory requirement of 28 days). The 22 working days allowed is a very limited time period for a consultation relating to a multi-site Nationally Significant Infrastructure Project (NSIP) and for a response to be drafted and endorsed by Members of both Councils. Similarly, the cycle of Parish councils' meetings means that they need to be given a reasonable amount of advance notice in order to mobilise and provide constructive and meaningful feedback to the consultation.

Hard to Reach Groups - Given the significance of the Proposed Changes the Councils consider that it is essential that the appropriate consultation methods and initiatives are used to reach all community groups, including 'hard to reach/hard to hear groups' that are likely to be subject to significant impacts as a result of the Proposed Changes. The Councils wish to register their regret with EDFE's response to this issue that "we consider it would be disproportionate to hold specific events for 'hard to reach/hard to hear groups' as we are not consulting on the project as a whole", given the lack of attention on this matter to date. This process represented an opportunity for EDFE to tackle the issue of low levels of engagement in Bridgwater in particular. Low responses cannot be interpreted as passive acceptance and Sedgemoor District Council (SDC) are currently conducting a survey to gauge understanding of the HPC project.

Transport Assessment and Proposals

A further major concern is that EDFE have not responded in adequate detail to Council and local community representations on transport matters. In particular, EDFE have yet to provide a full options appraisal of highways options, to include a north Bridgwater bypass or haul road. Nor are the brief outlines of highways measures set out in the Proposed Changes supported by adequate transport assessments and draft designs. Transport impacts, along with Accommodation, and related secondary impacts are viewed by the Councils and local communities to be the most important two issues, which have yet to be addressed in a credible manner.

Workforce, Employment and Skills

Workforce Numbers – The reasons for the predicted increase in the number of people working on-site at peak from 5,000 to 5,600 is understood by the Councils. The rationale behind this figure has been agreed with EDFE following review of a supporting technical paper entitled Workforce Profile Report. The Councils' primary concern is that of maximising the local supply of labour, especially from groups who are currently not in work. EDFE's prediction is that 5,000 of 20-25,000 jobs could be filled by Somerset's residents, which underlines the importance of effective implementation of the measures below. The Councils note the predicted lower levels of local labour and subsequent reduction in economic benefits to the local area which EDFE has been consistently highlighting.

Employment Brokerage – The Councils welcome and support the steps made by EDFE to forge a working partnership with Jobcentre Plus in delivering the employment brokerage, and ongoing work to integrate this with the employment and skills initiatives of other major employers (e.g. Morrisons/DHL). The employment brokerage is still at a formative stage and there are two areas in particular that should be further developed:

1. engagement with the Councils', voluntary and community sectors operating in areas of high deprivation to support access to employment through outreach; and
2. promoting enterprise, social enterprise and self employment as an alternative to mainstream opportunities.

The success of the brokerage is dependent on urgent implementation and outreach in deprived wards, working collaboratively with Council economic development and community teams.

The establishment of a HPC project information office in a highly visible and accessible location in Bridgwater town centre is also promoted as a means for advertising housing and support services, information on training and job opportunities, which could also act as a 'One Stop Shop' contact point for the project.

Skills Investment in Somerset Colleges – The Councils welcome and support the growth in the overall scale of funding committed to the creation of training infrastructure at Bridgwater College and West Somerset Community College. Further detail is requested on how many local people will receive training as a result of this investment, in addition to programme development in the following areas: training in Mechanical & Electrical (M&E) skills where there is believed to be an acute shortage of trained professionals; and enterprise training that would enable local people to start businesses that could form part of the HPC project supply chain.

Apprenticeships for Local People - The Councils welcome the commitment to a specific number of apprenticeships in the local economy which reflects changes in the Government's training priorities. The Councils are also keen to ensure apprenticeships are promoted throughout the supply chain and skills areas across all phases of the HPC project, and through business support mitigation initiatives.

The Councils wish to reiterate the urgency with which employment, skills, training, business support and outreach initiatives need to be established if shared local labour objectives are to be achieved for the early stages of construction, notably the applications for site preparation and the construction skills centre

A failure to do so would have significant knock-on effects for the transport and accommodation strategies (and the magnitude of related impacts) and a further reduction in socio-economic benefits. Integration and alignment of EDFE initiatives with those of the Councils and partner organisations should be undertaken to improve efficiency and effectiveness.

The commitment to establishing a local labour agreement will continue to be a core obligation with the need for resource and delivery plans, including strategic resource agreements with Councils' to ensure a comprehensive approach to outreach services embedded into local neighbourhoods, to ensure the best chances are created for local people to improve their life chances.

Local Businesses and Hinkley Point C Supply Chain

Local Businesses and Hinkley Point C Supply Chain – Work to establish a Business Engagement Forum is welcomed however Councils are interested to further understand how this can integrate with existing fora to add value and avoid duplication.

There would seem a lack of understanding of understanding of the respective roles Councils' and other different agencies. Into Somerset Ltd is the Inward Investment Agency for all Councils. The Districts as planning and housing authorities are responsible for land management and release to secure economic growth and job creation, and local labour agreements, as well as regeneration,

infrastructure investment coordination, and finally the monitoring of delivery to the Government. It is critical that investment works together and is phased and coordinated to create places that people want to live in, work and spend their leisure time in.

Moving forward from the current arrangement of monthly meetings, the long term success of any forum will depend on effective partnership working. In addition to those activities set out in the Proposed Changes, the Councils consider that EDFE should extend initiatives to the "low tech" businesses that may be established in the accommodation, catering, retailing and cultural sectors. These businesses may need support, such as bespoke advice and business support, at a time when existing intervention mechanisms are being cut back.

Attracting Economic Development into Somerset – The Councils attach a high priority to using the project as a means of accelerating a move to high value knowledge based economy, particularly in relation to low carbon industries. EDFE input and support for the development of low carbon business cluster is therefore welcomed. It is important to clarify that EDFE will need to work closely with the district Councils, in addition to Somerset County Council, on an economic development strategy that positions Bridgwater at the centre of a low carbon business cluster whilst demonstrating that new and existing businesses in West Somerset and Sedgemoor can also reap the benefits to its economy. Further commitment to attract and secure inward investment via the supply chain and associated support services, is sought. Investment that is sustainable post construction will be valuable to avoid a 'boom and bust' scenario and to ensure wider job opportunities in the future and to avoid a spike in unemployment.

Protecting and Enhancing other Economic Sectors The Councils will seek to maintain the attractiveness of their areas as a visitor destination and support, in principle, the development of a Public Information Centre (PIC) for Hinkley Point as a means of creating a further indoor attraction for visitors. Travel planning for PIC visitors in the short and long term is an outstanding matter to be discussed and set out in proposals and relates back to issues concerning the long term use of park and ride sites

Although EDFE have held a tourism workshop (as referred to in the Proposed Changes), further work is required to understand the potential impacts of the HPC project for this sector, particularly in relation to transport and the implications of congestion. Furthermore, food and drink, land based industries and logistics are all important employers both in their own right and collectively in terms of connections between industries e.g. specialty foods and tourism. The Councils are seeking further information from EDFE on how the project will impact on these type of economic sectors, specifically in relation to access and journey time reliability and in terms of the loss of key staff in areas of skill shortage.

Initiatives and measures will be sought to minimise adverse impacts to support and maintain key sectors and to revitalise existing assets such as tourism trails and to build networks and relationships for example in the food and drink sector and related supply chain. The use of local knowledge and experience is recommended.

Strategic Resource Agreements with Councils' to support project implementation and to meet the economic development and low carbon visions agreed will be sought.

Accommodation Proposals

Overall, the Councils' have noted some material improvement in the accommodation proposals for the HPC Project. However, these do not yet adequately reflect the concerns raised at Stage 2 or the approach and objectives set out in the Councils' Draft HPC Supplementary Planning Document. Whilst evidence of supply of non-campus accommodation has improved and a rationale for distribution presented, the Councils would strongly encourage EDFE to take a significantly more pro-active response to accommodation provision and management, and to seize the opportunity to further downsize the scale of temporary accommodation campuses in favour of delivering permanent accommodation that would provide legacy housing for local people in accordance with the Joint Dillington vision on Housing (Accommodation). This would provide a tangible legacy for local communities and help meet the Governments wider objectives to deliver housing growth.

Existing Accommodation – EDFE's Proposed Changes to use of existing accommodation (owner occupied, private rented, latent supply and tourism accommodation - hotels, B&B and caravans) are viewed as materially unchanged, with only a small change in capacity from 1,960 bedspaces at Stage 2 to 2,000 bedspaces. The Councils support the approach of using some existing accommodation, providing the process is carefully managed; but there remains a significant concern about the impact on the private rented sector. A commitment is made in the Proposed Changes to the monitoring of use and management of existing accommodation, however, there is insufficient detail of measures to provide confidence. Nor would there appear to be any mechanism in place for dealing with any adverse impacts should monitoring indicate that this is occurring.

A key concern relates to the implications of take up of private rented accommodation by workers with a higher than average income. The Councils anticipate that growth in demand for private rented accommodation will increase local rental rates, resulting in adverse affects on communities where low cost affordable housing is already in short supply. Affordable housing is one of the Council's key priorities and the Proposed Changes consultation does not alleviate this fundamental concern. The Councils are also mindful of the use of owner-occupied units as the difference between average house prices and average wage levels is particularly stark in West Somerset and any overall increase in average house prices caused by the project would lead to a greater number of local people in housing need. The Councils have consistently set out these views since the Stage 1 consultation and they have yet to be satisfactorily addressed.

As set out in the Draft HPC SPD, the Councils broadly support the use of tourism accommodation by construction workers, recognising that during the off-peak season it can provide an opportunity for additional income to help support businesses. The take up of visitor accommodation must be closely monitored and managed to ensure that take up of bedspaces by construction workers will not displace visitor trips to the area.

Purpose-Built Campuses – A reduction in the number of temporary campus bedspaces from 1,925 to 1,510 is viewed as only a minor improvement when compared to the preferred approach set out in the Draft HPC SPD, which sets out a preference for permanent housing that aligns with the spatial strategies for the districts and would have beneficial legacy uses. EDFE's current approach is not supported by the Councils as the current accommodation proposals will

undermine important regeneration strategies and investment proposals when they could be making a positive and early contribution.

On-Site Campus – While the proposed reduction in the scale of the campus from 700 to 510 bedspaces represents a minor improvement, West Somerset Council (WSC) do not support the principle of an on-site campus other than for workers for whom it is essential to be based at the site. The Council and the local community has continuously requested clarity on the minimum number of workers required and this has not been forthcoming. In terms of siting and layout, measures to reduce the visual impact of the scheme are welcomed in principle, although the illustrative photomontage from the 'Pumping Station' in Shurton reveals that the campus would still be a prominent feature. Relocation of sports and leisure facilities to the north-east of the site to enable community access is acknowledged as a measure to address previous comments, however, this does not adequately deal with the social cohesion issues set out by the Council in the Stage 2 response. The suggested benefits of relocating the campus away from Shurton and Burton, only to be replaced by construction compound, remain unclear in the absence of further details and preliminary environmental information to assess the impacts of the proposed changes. Overall the Council continues to have major concerns regarding the unacceptable impact on communities closest to the site resulting from the size and location of the on-site campus, both as an individual issue and in cumulative terms. The Councils seek to accelerate discussions around whether these could be located in settlements where they could provide permanent legacy benefits, as outlined in the Councils draft HPC SPD and as advocated by the local community.

Bridgwater A (Innovia Site) – SDC consider that the campus proposals, which include options for 850 and 1,000 bedspaces, have seen only small improvements from the Stage 2 proposals for 1,075 bedspaces. One positive change is the proposal that the sports and leisure facilities would be accessible to the community and located outside the boundary fence, although it is not clear that these would even adequately replace the existing provision at Bridgwater Sports and Social Club. SDC do not support the principle of a temporary campus of the scale proposed and are concerned that there has been very limited progress towards addressing issues raised at Stage 2 and in responding to the approach set out in the Draft HPC SPD. In terms of siting and layout, insufficient information is provided to demonstrate that the campus plans align with the masterplan for permanent development. Other outstanding concerns are the scale of the campus and potential for social tensions to arise, together with lack of investment to provide a high quality frontage to and public realm along Bath Road. SDC's preferred approach would be for EDFE to submit an application to SDC for a mix of permanent and temporary build accommodation, consistent with the approved design principles for the site. The original intent was to integrate into this site for family housing and this should remain a consideration.

Bridgwater C (Rugby Club Training Pitch) – It is the view of SDC that there are some minor improvements to the proposals, with some evidence being provided that links between accommodation at Bridgwater A and C have been considered (e.g. shared communal canteen and bus stop provision). Notwithstanding this, there remains a concern about a lack of basic self-sufficiency in the Bridgwater C accommodation units, where standard kitchen provision should be provided for individual or small groups of bedrooms. This would enable those working shift patterns to have the ability to have basic

provisions with a full range of services on Bridgwater A. If no facilities were provided there would seem to be a question over the accommodations ability to fulfil its intended legacy.. The Council also supports the development of this site as the only current proposal with a permanent legacy use, although importantly, there are still no proposals for replacement of the existing rugby facilities which generates an unnecessary policy objection. . Revisions to the siting of buildings align with design principles in the Draft HPC SPD, however there is considerable further scope for the design to contribute to a legible and enhanced public realm at the A39 entrance to Bridgwater College. SDC are concerned that the proposals may not be delivered due to the constraints imposed by the historic landfill operations within the site and are seeking environmental information that assesses the impact of building on a contaminated site, with mitigation solutions identified.

New Housing – The Councils welcome and support the statement by EDFE that they will explore the possibility of working with developers and the local authorities to facilitate housing development and property refurbishment. Both Councils would also wish to point out that recommendations made by them to date have been on the basis of delivering permanent build housing as part of a suite of accommodation solutions, rather than to completely replace campus facilities. As set out in the Draft HPC SPD, that remains the position to date with an emphasis on reducing the scale of both the main site and Bridgwater A campuses. Accommodation at the main site should be reduced to the minimum requirement and at Bridgwater A to a scale that enables provision of permanent housing and prevents purpose-built accommodation being concentrated in only one part of the town. The Councils require a greater degree of certainty about the delivery of new housing than that provided in the Proposed Changes document.

The Councils would wish to ensure there are is a phasing plan in place associated with any planning consent for campus accommodation, related to the delivery of permanent housing solutions.

Strategic Resource Agreements to ensure that Councils have the capacity and skills required to support and manage the housing development activities and the implementation of any mitigation funds will be required as part of obligations

This issue remains of fundamental importance and is something where the Councils have seen little demonstrable evidence of improvement despite raising it as an issue during their Stage 1 response back in January 2010.**Housing Fund** - The Housing Fund proposals mooted by EDFE in the draft Strategy are in principle welcome and supported by the Councils. The Councils, however, do not have confidence in EDFE's assessment that £5million will be sufficient to address 'residual local accommodation impacts' over the period up to project completion.

A workshop with key officers and EDFE is organised to further explore impacts prior to any discussion on mitigation.

Accommodation Office - The Councils support the proposals for an accommodation office. The office will need to be based in a visible and accessible location and will need to cater for those that arrive to the town speculatively, those in between jobs and may require access to benefits advice, or those wishing to change accommodation. It should be physically close to the employment brokerage and other support services provided by the Council. Scope

to integrate services with the Council should be considered rather than create parallel systems and services, and duplicate costs.

An accommodation outpost at the induction centre is noted but will only serve those already in work.

SDC would welcome discussions with EDFE to identify a suitable site in Bridgwater town centre that could help contribute towards delivering the wider Bridgwater Vision objectives. An accessible location for workers arriving by public transport as well as by car will be an important consideration.

The concept of a HPC project 'One Stop Shop', with links to the Employment Brokerage initiative and other services that workers or prospective workers need to access, is promoted. A facility of this type would also provide information for the local population and provide a point of contact in the event that problems arise. Proposals for the town centre HPC project 'One Stop Shop' will require further, urgent development to meet with EDFE's preliminary works timetable.

The Councils very much see the importance of local knowledge and already well developed local relationships with existing providers when considering how to manage worker interaction with Tourist Accommodation. The opportunity to link with existing Visitor Information Centres, in terms of brokerage, such as the centre in Minehead and the Visitor Centre at the Hinkley Point C site should not be lost.

Community Proposals – Impacts and Benefits

Community Impacts and Benefits

The Councils support the broad structuring of payments into 'Mitigation Measures' and a 'Community Fund', but considers that the consultation information still falls well short of what should be provided prior to a Development Consent Order application. Paragraph 8 of the Infrastructure Planning Commission's (IPC) guidance note Pre-Application Stages states:

"The overriding intention of the legislation is to ensure that detailed matters are consulted upon and solutions or mitigation negotiated with the local community, landowners, statutory consultees and local authorities before submission of the application for development consent to the IPC."

Mitigation Measures - The consultation material provided at Stage 2 and the Proposed Changes are not sufficient to understand the potential impacts on local communities or the environment (as required in the Infrastructure Planning (EIA) Regulations 2009) and fails to set out the process for discussing and negotiating solutions or mitigation measures with the local authorities, local community and other key stakeholders. Comments on specific topics are as follows:

- **Health & Wellbeing** – The Councils support the preparation of a Health Impact Assessment and Health Action Plan by EDFE in consultation with key stakeholders. It is emphasised that payments to support local GP services should form only one part of a holistic approach to community health and well-being, including preventative and responsive measures to improve the environment, provide opportunities for a healthy lifestyle and support delivery of high quality health care provision.

- **Transport** – As set out in relation to Adequacy of Consultation and Transport Proposals, it is the Councils view that there has been very limited progress in terms of transport assessment and highways and mitigation proposals.
- **Emergency Services and Security** - The Councils are encouraged that EDFE is working closely with the Councils and the emergency services to develop plans for community safety and support to the emergency services. The Councils consider that it is necessary for EDFE to commit to ensuring that there is adequate emergency service resources and resilience to cover the potential for increased incidents at the Hinkley Point site, on the transport network, and in the towns and villages hosting construction workers. This would include a strategic resource agreement for relevant council services.

Environmental Mitigation - The Councils do not support the statement in the Proposed Changes document that reads “*details of local environmental mitigation will be finalised once our Environmental Impact Assessment is complete*”. The Councils believe that details associated with the environmental effects of the project and the measures required to mitigate or compensate for impact or harm should be presented and tested as part of the consultation process in accordance with IPC guidance and the requirements of the Planning Act 2008 and Infrastructure Planning (EIA) Regulations 2009.

During discussions with EDFE, the Councils have requested on a number of occasions that an assessment is undertaken of the combined effects (such as noise, traffic, visual impacts in combination) on the quality of life of local residents and on community well-being, and that this should be illustrated in a spatial manner. EDFE are urged to agree an approach to presenting impacts in a holistic manner that will be more accessible and easily understood by local communities and provide a sound basis for ongoing negotiations.

Local Mitigation – The Councils welcome and support an EDFE commitment to a local mitigation scheme that would encompass a Property Value Guarantee Scheme and measures such as the installation of double-glazing and landscape screening are welcomed. In the Proposed Changes document reference is made to the settlements of Shurton, Burton, Knighton and Wick. The Councils acknowledge that EDFE has consulted with these communities regarding a potential scheme and the Councils and communities would very much like to see the outcome of that consultation and discussion. The Councils emphasise that similar commitments may be required in some parts of other settlements that will be most affected by the HPC project, including (but not exclusive to) Cannington, Combech, Williton and Bridgwater. Measures of success or tests of satisfaction should be agreed with the community and councils.

Community Fund – The Councils support EDFE’s commitment to a Community Fund and are encouraged that the fund has been increased to £20 million. Nevertheless it is not currently possible for the Councils to assess, particularly given the absence of preliminary environmental information to support the Proposed Changes, whether this fund is sufficient to fully compensate for the harm of the HPC project. It is the Councils view that the HPC project construction activities could cause a fundamental shift in the character of the parishes to the west of Bridgwater, from a rural area to that of an increasingly urbanised environment, where a significant intensification of industrial and transport activity is experienced. Given the scale of the proposed works and the potential impacts the sum currently being offered, when considered alongside the

other financial commitments set out by EDFE in this consultation, is not likely to offer sufficient mitigation and compensation to the communities affected by the proposals.

Given the multi-generational impacts of the project, the sheer scale of the construction project and the scale of potential profit from the operation of the power station should it receive DCO approval, the figure of £20 million is not considered to be commensurate or acceptable to the Councils or the Community.

Outside the planning process, the Councils will continue to seek a Community Benefits Contribution Scheme and a Contractors Charitable Trust, as set out in the Draft HPC SPD.

Worker Code of Conduct – Establishment of a Worker Code of Conduct is supported and further details are required on how the code would operate, including: how measures will be legally enforceable; how the success or failure of the Code would be monitored and communities compensated if workers do not comply; and the role of different bodies (e.g. the emergency services) in enforcing the code.

Community Engagement – The Councils support the positive statement within the document confirming that the EDFE “communication teams in Bridgwater will engage with the local community throughout the project, and will be available for the community to contact should they have any questions in relation to the project”. Nevertheless the Council have a number of concerns with the community engagement undertaken by EDFE to date. A significant shift in approach and methods of engagement will be required to ensure that future engagement initiatives are more responsive and sensitive to local community issues and that EDF play a more proactive role in the re-investment and regeneration of Bridgwater, raising the ambitions of the community and improving the quality of life for local people.

Public Services – Additional to the Community Proposals headings set out in the Proposed Changes document, the Councils will seek a strategic resource agreement with EDFE for future stages of the project. Once the planning stage of the project covered by the Planning Performance Agreement (PPA) draws to a close, the Local Authorities will be faced with resourcing a range of consenting, monitoring, service delivery and enforcement activities in relation to the HPC project which, in line with its original approach, is not something the Councils would be willing or able to deliver through local taxation.

Construction Working Hours

Proposed Changes to construction working hours comprise earlier adoption of double shift working, amendments to double shift start and finish times and amendments to overnight and weekend working. The implications of these changes are summarised by EDFE as:

- Increased flexibility for contractors and increased time ‘windows’ for the transport of workers to and from sites.
- Earlier commencement of double-shift working and an increase in the working day from 6.00am – 11.00pm, to 6.00am until midnight.

- At weekends, the result of two contractor shift patterns could be that work would continue with weekday shift patterns, with work only ceasing every other weekend at 3pm on Saturdays and on Sunday.
- The Proposed Changes also reinforces the need for overnight working where it is necessary to maintain programme.

Construction working hours are a hugely significant concern to local residents and the Proposed Changes are considered a significant and unacceptable worsening of the proposals, due to: the extension of working hours; a lack of clarity in the consultation material; and absence of assessment of environmental effects. The impact of 24 hour / 7 day a week working on communities closest to the site is considered unacceptable – in terms of residential amenity and potentially in terms of residents on-going health. .

Particular areas where the Councils require detailed assessment are:

- **Transport** – Changes in shift hours will affect traffic levels. As discussed elsewhere in this document, there is no evidence base provided which supports the transport proposals, and in particular the effects of shift patterns on traffic flows and congestion.
- **Air Quality, Noise and Vibration** - Owing to the absence of details on the implications of changes of shift patterns to traffic and flows, resultant effects on air quality and noise remain to be understood.
- **Effects on Amenity** - Effects of the proposed changes in working hours and shift patterns have the greatest potential effect in terms of disturbance to local people and in terms of loss of local amenity. In many cases the restriction of working hours will be a principle mechanism for mitigating significant effects on human health and amenity.

Overall, the proposals are considered to represent a fundamental shift in the nature of the local environment, from a quiet rural setting towards that of a more urban / industrial environment with activities 24 hours / 7 days per week and cannot supported.

Transport Proposals

Transport Strategy - In comparison to the Stage 2 proposals the transport strategy remains materially unchanged, relying on:

- Provision of bus services from four Park & Ride sites for construction workers, with car parking at the site strictly limited.
- Road-based freight management facilities at M5 Junctions 23 and 24, with storage capacity provided at Comwich.
- Transport of bulk materials by water to a temporary jetty at the main site and Comwich Wharf

There continues to be a fundamental lack of an evidence base and assessment to justify the transport strategy, both in terms of: the location and size of the park and ride sites and freight management facilities; and the transport mitigation proposals, such as the highway improvements that would be required. This is a major concern to the Councils at this late stage in the pre-application process and

a cause of great anxiety to local communities who have reasonable concerns about highway safety, congestion and impacts on residential amenity.

In view of the inadequacy of consultation on transport at Stages 1, 2 and the Proposed Changes (identified by the Councils at each stage), the Councils cannot currently support the transport strategy or proposals.

The stated aim of the transport strategy of reducing the volume of traffic associated with the development of the new power station at all times, particularly peak times, is in general accordance with the sustainable transport approach set out in the Draft HPC SPD. However, the aim should be to minimise the volume of traffic associated with development, not just reduce it. In addition, the following critical deficiencies remain:

- A full New Approach To Appraisal (NATA) assessment of Bridgwater bypass/haul road, Bridgwater highways improvements and Cannington bypass options remains outstanding. Appraisals of the deliverability of these options are also required.
- The consultation document focuses on the situation of peak construction traffic during development. It does not address the situation in the first years of construction before mitigation measures are provided, or the operational phase post construction.
- Lack of proposals for sustainable transport schemes identified in the Draft HPC SPD, such as bus priority, enhancement of rail facilities, walking and cycling and related public realm investment.
- Lack of information on control mechanisms to ensure the strategy is effective, such as monitoring, travel plans, incident management and enforcement measures.

Cannington Park & Ride - It is the view of SDC that the proposed changes to the Cannington Park & Ride proposals include improvements that positively address some previous comments, in particular the reduction in capacity from 381 to 252 parking spaces. Located at the junction of the A39 and C182, it is considered that Cannington is a logical location for a Park & Ride serving the surrounding rural area. However, consistent with the Draft HPC SPD, for a temporary Park & Ride facility to be supported, it must form part of a well evidenced and robust transport strategy and investment package, which have yet to be provided. The reduction in the scale of the Park & Ride proposal by almost a third (in terms of car parking spaces) is considered a positive step as it would contribute to reducing landscape and environmental impacts. Design changes that locate the Park & Ride further west and within the boundary of a single existing field are viewed as improvements, as are new proposals to improve paths to the village centre. The use of the park and ride at this site and also for the proposed Bridgwater park and ride sites, for approximately 250,000 visitors pa (1,000 per day), to the main site visitor centre is not clear and clarification is sought on a visitor management plan for the short term during construction and into the long term when the site is operational.

The Council seeks more information on the highway safety implications of providing a T-junction instead of a roundabout into this proposed park and ride site.

Williton Park & Ride - Following the Stage 2 proposals, the proposed Williton Park & Ride site has been relocated from the greenfield site at Mamsey Lane to the Smithyard Terminal (known as the Lorry Park) site and the capacity has been reduced from 328 spaces (Stage 2) to a total of 160 spaces (Proposed Changes). It is the Councils view that the proposed reduction in car spaces is a positive step, subject to the provision of a full and robust transport strategy and investment package, and that both the Smithyard terminal and Mamsey Lane sites have their merits and potential disadvantages. The provision of a Park & Ride at Smithyard Terminal would involve use of a brownfield site and could facilitate much needed junctions improvements at Washford Cross. In comparison, siting the Park & Ride on the A39 at Williton would improve accessibility for users and allow them to visit shops and facilities in the village. As set out in the Draft HPC SPD, the Mamsey Lane site also offers potential for alignment with plans for a sustainable housing extension to Williton and could contribute to the delivery of highways, flood risk management, utilities and community infrastructure requirements for the village. Siting the Park & Ride close to the village may, however, result in greater disturbance for residents during the construction phase. The process of site selection is finely balanced in this case and the Councils view is that the Smithyard Terminal would be the preferred solution and should be supported however, this is based on an understanding received from EDFE that this approach would not harm prospects for the provision of permanent housing for use by construction workers being brought forward at Williton.

M5 Junction 23 Park & Ride and Freight Management Facility - It is the view of SDC that the proposed changes to the M5 Junction 23 proposals have been worsened through a substantial increase in the capacity of the facility with no detailed justification (increase in parking from 772 to 1,300 spaces). The location of the proposed Park & Ride site and freight management facility is considered logical and may be the most appropriate of the four sites for expansion, given the adjacent industrial land uses and distance from residential properties. Nevertheless, SDC cannot fully comment on the proposal until a robust and detailed transport strategy is provided, along with a detailed Flood Risk Assessment. It is also notable that the Proposed Changes introduce a proposal for a sizeable induction and training centre on a temporary development site outside the Bridgwater settlement boundary. There has been no previous public consultation on this proposal and no detailed consultation with the planning authority, despite several requests.

The reasons for provision of an induction facility at M5 Junction 23 are understood from one verbal briefing which now needs to be followed by a fuller briefing. In general terms here is a strong preference for any sizeable training and education facilities to be provided as a refurbished or new permanent building closer to the town centre on an existing employment site. Further details of how this facility would operate would be helpful in allowing the Councils to assess this proposal.

M5 Junction 24 Park & Ride and Freight Management Facility - It is the view of SDC that the M5 Junction 24 proposals remain materially unchanged (parking remains at 698 spaces), with the exception of some minor adjustments to layout and relatively small increase in freight holding capacity (increase from 45 to 55 spaces).

The general location of the proposed Park & Ride site and freight management facility is considered logical.

With respect to the design of the proposed Park & Ride and freight management facility, it is considered that there has been only one minor improvement. This involves the setting back of the boundary of the freight parking area slightly further from the distributor road to the north. The overarching design concerns raised at Stage 2, such as the expansive green field land take and inadequate landscaping and screening on a highly visible site, still apply and are a serious concern for nearby residents and the Council.

Reference is made in the Proposed Changes to the pending planning application for the site and it is encouraging that EDFE state that they would be willing to explore working with the applicant. The application for Bridgwater Gateway includes temporary park and ride and freight facilities which could be subject to the resolution of final design and associated obligations and conditions. The detailed planning and implementation of the site would need to be consistent with the Council's approved design principles.

Combwich Wharf – The proposed changes for Combwich Wharf comprise improvements from Stage 2, where a significant intensification of activities was highlighted by Otterhampton Parish Council and SDC. Positive changes include: no fabrication facilities or large storage buildings to be provided; no bus parking to be provided at Combwich; the size of the storage area would be reduced; and a new access road to the wharf that could help to reduce disturbance for residents. In terms of layout and design, the Council will seek to ensure that the size of the storage site is minimised and that a more effective landscaping and screening proposal is put forward. In this regard, clarity is sought over whether the storage area would be used for road-based freight in addition to water-based freight. The Draft HPC SPD sets out a position where the storage of road-based freight at Combwich would not be acceptable. Hours of operation of the wharf and storage area will be key to protecting residential amenity and in this respect, shipping movements at night and HGV movements during the late evening remain a concern. Further information is required on the detailed changes to the wharf and the impacts on flood risk to the village. A full flood risk assessment is required. Again the Councils are concerned given the significance of the proposed changes that no preliminary environmental information has been provided to assess the impacts of the changes and to inform the approach to mitigation and compensation.

Cannington Bypass - In terms of responding to comments raised in the Stage 2 proposals, the revised proposal set out in the Proposed Changes represents a slight improvement. Changes include the replacement of the underpass for cattle with an at-grade crossing and the removal of the proposed junction onto Wylds Road to prevent 'rat running'. However, without assessment of alternatives it is not possible to say whether the scheme put forward by EDFE represents the best means of alleviating traffic impact in Cannington. A full NATA assessment should be submitted to support the provision of Cannington Bypass and the route chosen. Until this is submitted it is not possible to assess the need for and impact of the bypass. This assessment should include alternatives, including the provision of a Bridgwater Northern Bypass or haul road.

Transport related impacts at Cannington, that would occur during the proposed preliminary works and during the main works prior to the construction of a bypass, are a major concern that are not addressed by the consultation and represent an important omission. This potentially represents a substantive period of disruption affecting the amenity of the village for approximately three years.

Other Highway Works

The following improvements to mitigate traffic impact are identified:

- A39 Broadway/A38 Taunton Road Junction
- A38 Bristol Road/Wylds Road Junction
- Wylds Road/The Drove Junction
- Northern Distributor Road/Chilton Street Junction
- Cross Rifles (Cannon) Roundabout
- A39 Bath Road bus priority measures
- M5 Junction 23 Signalisation
- M5 Junction 24 Partial Signalisation.

In general the proposed junction schemes relate to the operation of signal control rather than physical improvements. It is a welcome step that EDFE have begun to identify those locations where it is expected that highways improvements will be required, however, no assessment has been presented of the need for, deliverability and impact of the proposals. There is also insufficient information about the design of the proposals and the effects they could have on non HPC project related traffic, with potential detrimental effects for residents and existing businesses.

The following additional improvements resulting from community consultation are identified:

- A39 New Road/B3339 Sandford Hill Junction – provision of roundabout
- A39 Washford Cross – provision of Roundabout
- Cannington traffic calming
- C182 Farrington Hill Lane horse crossing
- C182 parking controls
- Junction improvements at Claylands corner.
- Junction improvements at the Shurton turn.

It is positive that EDFE are seeking to address concerns raised during the previous consultation, however the lack of plans or assessments showing how effective these interventions would be is a major shortcoming of the consultation. For instance, it is not clear how traffic calming measures in Cannington would mitigate the high volume of HGV movements through the village predicted at the preliminary works stage. There is also a failure to respond to previous consultation comments, such as the potential need for junction improvements on the C182 at the Combwich turning.

In addition to the junctions themselves, there would appear to be a lack of attention to the performance of the 'links' between junctions. The network needs to be considered as a system.

Cycle and Rail Improvements – The Councils welcome a commitment from EDFE to contribute towards the provision of cycle routes, which are viewed as important measures to help improve safety and provide an environment that encourages non-car modes of transport. However, given the late stage in the consultation process, there is a failure of EDFE to provide any details of cycle routes and scheme details, on which the local communities and Councils can comment. It is disappointing that the potential use of the rail station is omitted, with no investment plans to Bridgwater rail station and the pedestrian links into the town centre. Investment that can contribute to improving the wider 'place' and providing amenity improvements for workers, the supply chain and local residents is to be encouraged if the town is to realise its potential as a 'host' community for the site.

Whilst SDC is encouraged by the offer to second in a project manager (confirmed in parallel to this consultation) to Bridgwater Vision we would wish to further see how EDFE can realise wider forms of investment to support the regenerate of the town and specifically the public realm, and performance of the town centre.

Hinkley Point C Main Site Proposals

In addition to the proposed changes to the on-site accommodation campus (covered above), EDFE set out a number of amendments to the main site proposals.

Early Restoration of the Southern Area – WSC have previously raised concerns about the adequacy of the landscape buffer at the southern part of the site and a commitment to early implementation is considered an improvement to the phasing of works.

National Grid Services – It is noted that HPC project related proposals for three end (terminal) towers (pylons) and connection wires will now be incorporated in the DCO application by National Grid rather than the HPC project DCO application. Nevertheless, the cumulative impacts of the two applications will be an important consideration and a coordinated approach to the presentation of proposals and consultation by EDFE and National Grid will be expected.

Emergency Access Road – The provision of additional details on the emergency access junction is useful and the commitment that the route would only be used to respond to an incident at the station is important. Given that hedgerow removal is proposed, details of replacement boundary treatments that would maintain visibility splays and be appropriate to the setting are required.

Fish Recovery and Return (FRR) for Hinkley Point C - It is noted that a FRR system is proposed and further preliminary environmental information and design will be required before the Councils can comment further.

Extreme Rainfall Storage Provision – The provision of flood risk management infrastructure to cope with 1 in 10,000 rainfall events will provide reassurance about the safety of the station in extreme events. A full Flood Risk Assessment and scheme design will be required before the Councils can comment further.

1 Introduction

1.1 Purpose of the Response

West Somerset Council and Sedgemoor District Council (the Councils) welcome the further opportunity to comment on EDF Energy's (EDFE) emerging proposals for the construction and operation of a new nuclear power station and waste storage facility at Hinkley Point. Throughout this response any references to the Hinkley Point C (HPC) project shall encompass the power station and waste storage facility, as well as any associated development including construction workers accommodation, freight and logistics and park and ride sites.

The EDFE consultation sets out an update on and proposed changes to the preferred proposals set out at Stage 2 (consultation from July 2010 to October 2010) and, likewise, the Councils' response set out here does not seek to repeat all matters raised previously. This document is therefore additional to and should be read alongside the Councils' detailed Stage 2 Consultation Report (September 2010). The EDFE "Update on and Proposed Changes to 'Preferred Proposals'" consultation is referred to as the Proposed Changes for brevity throughout this document.

The Councils' response is based on national, county and local policy and guidance and takes account of feedback received from local communities during the consultation period.

1.2 First Principles

The details of this response to the Proposed Changes consultation should be viewed in the context of a series of overarching points the Councils wish to highlight. At the outset of the pre-application process, EDFE, Somerset County Council and the District Councils agreed a Vision and development objectives within the Planning Performance Agreement (PPA). Now that applications for preliminary works have been submitted and a Development Consent Order application is scheduled to be submitted this year, the PPA vision provides a means for gauging progress.

The development contributes to the national need for secure, low carbon electricity.

Acknowledging that the designation of HPC will be determined through the National Policy Statement (NPS) process and that there is potential for positive socio-economic effects, the Councils have adopted a broadly supportive stance to the project, with full engagement with EDFE. Nevertheless, there remain substantial concerns around the impacts of the project at the construction phase as well as issues around fully compensating and mitigating the impact of the project, including the storage of nuclear waste for over 100 years.

Transport impacts have been a major cause of anxiety for local residents and existing businesses since the Stage 1 consultation and EDFE have so far failed to respond on this matter in a comprehensive and credible manner. The Councils have not had sufficient detailed information presented to them in order to judge whether the proposed transport strategy and mitigation proposals are fit for purpose and will adequately mitigate what the Council's and local communities

believe to be significant impacts of the project on the highway network. The information expected should be of at least the same standard and detail as other developers who make applications for planning permission.

In particular, the strategic highway option of a Northern Bridgwater Bypass or Haul Road has been actively promoted by large numbers of people during the current HPC consultations and indeed, by the Councils and communities prior to the EDFE consultations. During the Bridgwater Vision process, for example, and stretching back to the previous considerations at the last Inquiry for HPC new build. The scheme is considered to be a strategic investment which could have helped to manage impacts and support the wider regeneration of Bridgwater and link to wider improvements in Cannington.

The fact that EDFE's decision to discount the Bridgwater bypass option is not supported by a thorough assessment and fully evidenced and plausible alternative is a paramount concern for the Councils, and the foremost shortcoming of the pre-application process to date, presenting a serious risk to timely project delivery.

No parallel investment is currently proposed which directly reduces energy costs to communities or helps local communities generate their own electricity.

The development contributes significant socio-economic benefits through local employment opportunities, training and workforce development.

Initiatives relating to workforce, employment, skills and engagement with local businesses are in areas of the project where the Councils have seen good progress since Stage 2 and this is welcomed. While there remain areas where additional activity is required, such as outreach to deprived communities and support for enterprise, the Councils acknowledge that work is ongoing and that it takes time to put the appropriate organisational arrangements in place. We have, however, now got to the stage where urgent action is required to facilitate the outreach work as part of the brokerage service, to ensure local people have access to opportunities and jobs as part of the site preparation process. The Councils are keen to work with EDFE to bring their local knowledge and contacts to bear in facilitating and managing a community outreach programme.

In relation to the promotion of inward investment and the development of the low carbon cluster, the Councils consider that a priority area is for the alignment of the cluster delivery plan with the Core Strategies, economic and regeneration plans for the two districts.

The development positively contributes to local place shaping and transformation in line with local priorities for regeneration.

To date no proposals have been put forward to contribute to the wider regeneration of Bridgwater, such as contributions to the pool or to new town centre leisure facilities such as improved cinema or bowling facilities. However, recently there have been productive discussions about EDFE seconding in a project manager for the town. We look forward to this post, championing investment opportunities and driving investments into Bridgwater.

Construction worker accommodation and the provision of associated facilities, such as sport and leisure, are key areas where there is an opportunity for investment to be channelled into proposals with immediate and lasting regeneration benefits, which provide a legacy for local towns and communities.

While the Proposed Changes consultation includes some site-specific improvements that respond to previous comments, EDFE's strategic approach with regard to purpose-built accommodation continues to conflict with Council spatial policy and guidance and alternative approaches are recommended. Large temporary accommodation campuses are considered to be detrimental in terms of place making and regeneration objectives in the short and medium term, providing a poor quality built environment. They also represent an unsustainable approach for the long term as temporary units will need to be removed and the land redeveloped. The reference in the Proposed Changes document that EDFE are exploring whether they can work with developers and local authorities to facilitate new housing development and property refurbishment is helpful and the Councils will seek to encourage this approach and maintain a dialogue on this matter.

As far as accommodation management is concerned, the Councils remain very concerned that the light touch approach proposed will not be adequate to avoid, minimise or mitigate potential impacts on housing services or the wider housing market. A much more proactive systems based approach is sought.

The development is designed to comply with operational, safety and security requirements, and achieve a high quality design with environmental impacts minimized, managed and mitigated.

Work is on-going on community safety and emergency planning. This has progressed well however commitment to a proactive policing approach is sought, with support to Councils through Strategic Resource Agreements to ensure participation in emergency planning and responses.

Links into the community safety and socio-economic areas should not be underestimated, with coordinated service delivery into deprived communities, communicating project-wide issues and engaging hard to reach groups in project development and delivery.

Well thought through urban design approaches to both temporary and permanent buildings and infrastructure must meet Council and CABI requirements, and it is disappointing that the District Councils' as planning authorities, are yet to see or be briefed on design matters.

On the basis that it would not be possible to mitigate all construction impacts such as noise and light pollution through technical means, the agreement of reasonable construction working hours is seen by the Councils as an essential means for managing down environmental impacts. In this regard, the impact of extended working hours on communities closest to the main HPC site and those directly located to the transport corridors, is considered unacceptable, due to effects on residential amenity and health. Furthermore, the Proposed Changes do not set out the implications of shift pattern changes for operational hours at Park and Ride sites and the freight management facilities, which could be an important determining factor in the acceptability of associated development proposals.

During discussions with EDFE, the Councils have requested on a number of occasions that an assessment is undertaken of the combined effects (such as noise, traffic, visual impacts in combination) on the quality of life of local residents and on community well-being and that EDFE demonstrate how their proposals will effectively minimise, manage and mitigate impacts on local communities. This information has not been forthcoming and the Councils, in the absence of this information, believe that the impacts (such as direct, indirect, in-combination and

perceived impacts) on local communities could be considerable and will require a comprehensive and substantial package of mitigation and compensation, to accord with the policies of the Councils.

The EDFE proposals for local mitigation schemes for Shurton, Burton, Knighton and Wick are supported and similar commitments will be required in other areas most affected by the HPC project.

The development is appropriately scrutinized, its environmental, social and economic impacts are robustly established, and it can be implemented with the first unit supplying electricity by end 2017 and the second by end 2018.

The Councils have an outstanding concern that detailed environmental matters have not been consulted upon and solutions or mitigation measures would not have been discussed with stakeholders prior to submission.

As set out above, the lack of detailed transport assessment is of fundamental importance, but there are other critical areas such as flood risk management where solutions remain to be proven. The absence of Preliminary Environmental Information (PEI) to support Proposed Changes, including a new Park & Ride site in West Somerset, is highlighted.

There is also a concern that economic benefits into the immediate local area promoted by EDFE are unproven, and failure to deliver early outreach services into communities, prior to Site Preparation, undermines the commitment given to use local labour. The rhetoric does need to be backed up by tangible action.

Commitment to avoid impacts which undermine the economic performance of the area and key towns, such as Bridgwater, through for example, traffic congestion, is still sought, as well as commitment to minimise impacts on the business sector, and support businesses to access the supply chain, through proactive procurement contract clauses.

It is the Councils' view that when measured against these vision statements, significant concerns remain about the proposals and a further commitment is required to translate rhetoric into tangible action.

1.3 Structure of the Response

The Councils' Response is structured as follows:

Chapter 2 provides feedback on the adequacy of the consultation

Chapter 3 sets out the policy, strategies and guidance framework and documents that underpin this response. More detailed references are provided throughout the document as appropriate.

Chapters 4 - 10 are ordered to mirror the sections in the EDFE Proposed Changes.

Within each section of chapters 4 - 10, the basic structure of the response is as follows:

- Summary of Key Changes
- Policy and Guidance
- The Councils' Response, in terms of whether the proposal is considered to have improved, worsened or be materially unchanged; and advice on whether

the proposal or approach is supported or not supported, subject to what caveats and together with an explanation.

- For site specific proposals, comments on design and environmental factors are provided.
- Where relevant, the Councils' preferred approach is set out with reference to the Draft HPC SPD position.
- Consideration of whether the draft supporting documents provided by EDFE provide a robust evidence base for the approach taken.

The Executive Summary provides a summary of the Councils' Proposed Changes Response.

2 Adequacy of Consultation

2.1 Summary of Approach

It is understood that EDFE's Proposed Changes Consultation has been conducted in accordance with a Revised Statement of Community Consultation (SOCC) published on 15th February 2011 and a supporting document to the Revised SOCC, entitled 'Hinkley Point C Proposed Changes to Preferred Proposals: Consultation Strategy and Revised Statement of Community Consultation' (emailed to the Councils on 10th February 2011), referred to in this chapter as the 'Consultation Strategy'.

West Somerset Council (WSC), Sedgemoor District Council (SDC) and Somerset County Council (SCC) provided comments on the draft Revised SOCC and the Consultation Strategy in January 2011 and EDFE's response to our issues were set out in a paper issued by email on 10th February 2011. This chapter of the Councils' response principally deals with four aspects of the Council's comments on the Draft SOCC and the Consultation Strategy that the Councils do not believe have not been appropriately or satisfactorily addressed.

It should be acknowledged that this chapter was drafted before the end of the Proposed Changes consultation period. Therefore the Councils have not had an opportunity to fully gauge the adequacy of the consultation through engagement with local communities and parish councils. This chapter of the report therefore sets out the Council's preliminary findings on adequacy of consultation based on an initial assessment and any feedback received at the time of drafting.

2.2 Policy and Guidance

It is acknowledged that some guidance on the approach to consultation for Nationally Significant Infrastructure Projects (NSIPs) has been set out at page 2 of EDFE's final Consultation Strategy. The Councils consider that the IPC's guidance note 1 on Pre-Application Stages (March 2010¹) is of particular relevance for all stages of pre-application consultation for NSIPs. This states:

¹ IPC Guidance Note 1 on Pre-Application Stages (Chapter 2 of the Planning Act 2008), Revision 1, 29 March 2010.

“The overriding intention of the legislation is to ensure that detailed matters are consulted upon and solutions or mitigation negotiated with the local community, landowners, statutory consultees and local authorities before submission of the application for development consent to the IPC.” (Paragraph 8)

Guidance published by Communities and Local Government (CLG) entitled “Planning Act 2008: Guidance on Pre-Application Consultation” is also relevant and paragraph 78 of this Guidance is referred to in EDFE’s Consultation Strategy. This states that where a promoter consults a community on changes or new options then:

“In such circumstances promoters should supply consultees with sufficient information to enable them to fully understand the nature of the changes (but not necessarily the full suite of consultation documents)”.

In addition, the Infrastructure Planning (Environmental Impact Assessment) Regulations 2009, combined with the provisions of the Planning Act 2008, require that pre-application consultation under section 42 of the Planning Act must also include consultation with the relevant consultation bodies on the preliminary environmental information. Regulation 9 requires that the promoter’s SOCC must state whether the proposals fall within the scope of the Directive, and if they do, how the applicant intends to publicise and consult on the preliminary environmental information.

The 2009 Regulations describe “preliminary environmental information” as information referred to in Part 1 of Schedule 4 which—

- (a) has been compiled by the applicant; and
- (b) is reasonably required to assess the environmental effects of the development (and of any associated development);

Paragraphs 19 – 20 of Part 1 of Schedule 4 require the following environmental information to be provided by a promoter:

‘19. A description of the aspects of the environment likely to be significantly affected by the development, including, in particular, population, fauna, flora, soil, water, air, climatic factors, material assets, including the architectural and archaeological heritage, landscape and the inter-relationship between the above factors.

20. A description of the likely significant effects of the development on the environment, which should cover the direct effects and any indirect, secondary, cumulative, short, medium and long-term, permanent and temporary, positive and negative effects of the development, resulting from:

(a) the existence of the development;

(b) the use of natural resources;

(c) the emission of pollutants, the creation of nuisances and the elimination of waste, and the description by the applicant of the forecasting methods used to assess the effects on the environment.

21. A description of the measures envisaged to prevent, reduce and where possible offset any significant adverse effects on the environment.’

2.3 Councils' Response

2.3.1 Engagement with the Councils on Draft Consultation Material

The Councils in their response to EDFE's Consultation Strategy recommended that EDFE work with the Councils to agree which elements of the changes to the 'Preferred Proposals' hold local significance, for example, on housing proposals and transport impacts. The Councils recognise that there has been some joint working with EDFE on some of the themes and issues associated with the strategies that inform the Proposed Changes proposals. Nevertheless the Councils are disappointed that we have had no opportunity to comment on the emerging Proposed Changes changes prior to the formal consultation and were not asked to comment on some of the draft supporting strategies.

2.3.2 Lack of Consultation on Detailed Matters

The Councils are concerned that the consultation material provided in the Proposed Changes does not include information (including preliminary environmental information (PEI)) on how the Proposed Changes will impact on local communities. EDFE clarified in their response to the Councils comments on the draft Consultation Strategy that "It is not our intention to publish further Preliminary Environmental Information in relation to this consultation". The Councils believe that the provision of PEI is pertinent to the promoter's Proposed Changes proposals as the proposed changes (as acknowledged at page 4 of EDFE's consultation document) "...could result in new or significantly different impacts on people living in the vicinity of any of the proposed development sites".

The Planning Act and 2009 EIA Regulations require the promoter to provide preliminary environmental information of the likely significant effects of a project on the environment, which should cover the direct effects and any indirect, secondary, cumulative, short, medium and long-term, permanent and temporary, positive and negative effects of the development. Information should also be provided on the measures envisaged to prevent, reduce and where possible offset any significant adverse effects on the environment. The Councils believe that given the potential for significant adverse effects, associated with the Proposed Changes (and which are likely to be different from those previously consulted on), the information required by the 2009 Regulations should have been provided as part of the consultation material.

The Councils raised a similar issue in response to EDFE's Stage 2 consultation and the Councils believe that the issues raised at this time on the deficiencies in the preliminary environmental information provided have not been addressed as part of the Proposed Changes or in the intervening period since the Stage 2 consultation. Unless EDFE propose to release the relevant preliminary environmental information for consultation prior to submission of a development consent order application, the Councils will have an outstanding concern that detailed environmental matters have not been consulted upon and solutions or mitigation measures would not have been discussed with the local community, landowners, statutory consultees and local authorities prior to submission.

2.3.3 Consultation Timescales

EDFE intend to carry out their Proposed Changes consultation within a 31 day period (3 days more than the statutory requirement of 28 days), despite the concerns raised by the Councils on this limited time period. The Councils appreciate that the shorter timescale reflects the fact that the consultation will only be focused on changes to the 'Preferred Proposals'. Nevertheless 31 days is in effect only 22 working days and is a very limited time period (to work with stakeholders and to arrange briefings) before drafting a response to be endorsed by Members of both Councils. The Councils alerted EDFE to the fact that Parish Councils do not meet that often and that they will need to be given a reasonable period of advance notice in order to mobilise and provide constructive and meaningful feedback to the consultation.

The Councils suggested (in their response to the Consultation Strategy) that it would have been helpful for the Councils to receive a complete set of the Proposed Changes proposals and supporting documentation prior to the launch of the consultation. Unfortunately the information was not provided in advance, as described above.

In summary although this response does provide a preliminary view on the consultation material, the Councils are concerned that the 31 day consultation period has provided a very limited period of time for the Councils to prepare a robust response, informed through engagement with the local communities. This is especially important as this would appear to be the last opportunity of Councils and Communities to comment and influence the draft proposals.

To address this issue and to address some of the concerns set out in the Councils' response to Stage 2 consultation, the Councils felt it necessary to prepare a Supplementary Planning Document on the Hinkley Point C project. The SPD is subject to wide ranging consultation with the local communities and parish councils and the draft sets out the Councils' recommended approach and design principles for the delivery of the HPC project, with a focus on associated development.

2.3.4 Hard to Reach/Hard to Hear Groups

The Councils stated in their response to EDFE's draft consultation strategy that:

“Although it is difficult to provide full comment on target audiences without the changes to the 'Preferred Proposals' being published - EDFE will need to consider what activities they may need to carry out to consult with 'hard to reach' and 'hard to hear' groups. For example, focus may be needed on deprived wards and in locations where there are pockets of unemployed or individuals out of work, who could be attracted back into work. To date engagement with communities likely to be significantly affected by the project, for example in Bridgwater, has not been sufficient to gain robust community views on proposals and impacts. A strong focus is sought to drive up the levels of interest and engagement specifically in deprived wards, and areas of the town, most likely to be affected. At present this is considered to be a weakness in the consultation process.”

The Councils wish to register their dissatisfaction with EDFE's response to this issue. EDFE state that “we consider it would be disproportionate to hold specific

events for 'hard to reach/hard to hear groups' as we are not consulting on the project as a whole". The Councils refer to page 4 of EDFE's consultation document that states that the proposed changes set out in the document "...could result in new or significantly different impacts on people living in the vicinity of any of the our proposed development sites". Given the significance of the proposed changes the Councils consider that it is essential that the appropriate consultation methods and initiatives are used to reach all community groups, including 'hard to reach/hard to hear groups' that are likely to be subject of significant impacts as a result of the Proposed Changes proposals.

This is such a missed opportunity if EDF are serious about the employment brokerage and engaging local people in the construction workforce. This combined with the lack of plans in place for outreach services creates uncertainty around the commitment to train and employ local labour and generates concern over the reality of the wider economic benefits of the project to the local economy.

2.3.5 Transport Assessment and Proposals

A further major concern is that EDFE have not responded in adequate detail to Council and local community representations on transport matters. In particular, EDFE have yet to provide a full options appraisal of highway options, to include a north Bridgwater bypass or haul road. Nor are the brief outlines of highway measures set out in the Proposed Changes supported by adequate transport assessments and draft designs. Transport impacts are viewed by the Councils and local communities as a paramount issue, which has yet to be addressed in a credible manner by EDFE.

3 Policy, Strategy and Guidance Context

This response to the EDFE Proposed Changes is based on national, regional and local policy and guidance. It also refers to project-specific visions and objectives that have been agreed by EDFE in discussion with Somerset County Council (SCC) and the District Councils. These are the Planning Performance Agreement (PPA) vision and objectives and the thematic Dillington Visions. In addition, EDFE has its own Corporate Social Responsibility (CSR) commitments it has stated it wishes to deliver, including those relating to sustainability. This chapter of the response sets out the policy framework for the HPC project, with more detailed references being provided where relevant throughout the document.

3.1 National Policy, Strategy and Guidance

3.1.1 National Policy Statements (NPS)

National Policy Statements (NPSs), produced by the Government, are to provide the principal policy guidance when the IPC (or successor body) examines applications for Development Consent and to inform the recommendations made to the Secretary of State:

- **Revised Draft Overarching Energy NPS (EN-1)(October 2010).** The Overarching Energy NPS sets out the national policy for NSIP energy projects

and establishes the need for new energy infrastructure. The NPS confirms that under the Planning Act 2008, the IPC must also have regard to any Local Impact Report submitted by a relevant local authority.

- **Revised Draft Nuclear NPS (EN-6)(October 2010).** The Nuclear NPS, alongside the Overarching Energy NPS, will be a primary decision making guidance document for the IPC. The draft Nuclear NPS lists the Hinkley Point C generating station site and identifies the indicative boundary for the site.

EN-1 and EN-6, in combination, provide specific advice to the IPC on how they should assess development consent applications, including advice on nuclear specific impacts (in EN-6), including flood risk, water quality and water resources, coastal change, biodiversity and geological conservation, landscape and visual, socio-economic, human health and well-being. Little guidance is given on off-site impacts and on the assessment of associated development proposals of a promoter and these remain a key point for the Councils.

3.1.2 National Planning Policy Guidance notes (PPG) and Planning Policy Statements (PPS)

PPGs and PPS's set out the Government's national policies on different aspects of land use planning in England, including housing, transport, economic development and flood risk. PPS1: Delivering Sustainable Development (January 2005) sets out the Government's objectives for the planning system, stating that good planning makes a positive difference to people's lives and helps to deliver homes, jobs, and better opportunities for all, whilst protecting and enhancing the natural and historic environment. PPS1 also warns that poor planning can result in a legacy for current and future generations of run-down town centres, unsafe and dilapidated housing, crime and disorder, and the loss of our finest countryside to development (para. 1).

PPGs and PPSs considered to be of particular relevance to the HPC project proposals are:

- PPS1 'Delivering Sustainable Development' (January 2005) – PPS 1 states that sustainable development is the core principle underpinning planning. Social cohesion, protection and enhancement of the environment, prudent use of natural resources and sustainable economic development are key themes addressed by the PPS.
- Draft PPS 'Planning for a Natural and Healthy Environment' (March 2010) – intended to eventually replace PPS9, PPG17, and partially replace PPS7 and PPG20, Planning for a Natural and Healthy Environment advises that LDF should set out a strategic approach for the creation, protection and management of networks of green infrastructure. This should facilitate protection and enhancement of the natural environment and provision of sufficient high quality sports, open space and recreational facilities.
- PPS4 'Planning for Sustainable Economic Growth' (December 2009) – PPS4 advises to help achieve sustainable economic growth, the Government's objectives for planning include: build prosperous communities by improving economic performance; reduce the gap in economic growth rates between regions and tackle deprivation; and promote the vitality and viability of town centres.

- PPS7 'Sustainable Development in Rural Areas' (2004) - Much of the PPS has or will be superceded by PPS4 and 'Planning for a Natural and Healthy Environment', however, policies on promoting sustainable patterns of development in rural areas are still relevant.
- PPS9 'Biodiversity and Geological Conservation' (August 2005) – PPS9 advises that plan policies and planning decisions should aim to maintain, and enhance, restore or add to biodiversity and geological conservation interests.
- PPS22 'Renewable Energy' (August 2004) – As an overarching principle, PPS22 states that 'renewable energy developments should be capable of being accommodated throughout England in locations where the technology is viable and environmental, economic, and social impacts can be addressed satisfactorily.'
- PPG13 'Transport' (April 2001) – The objectives of PPG13 are to integrate planning and transport at the national, regional, strategic and local level to: promote more sustainable transport choices for both people and moving freight; promote accessibility to jobs, shopping, leisure and services by public transport, walking and cycling; and reduce the need to travel, especially by car.
- PPG17 'Planning for Open Space, Sport and Recreation' (July 2002) – PPG17 advises that open spaces, sport and recreation all underpin people's quality of life. Well designed and implemented planning policies for these are therefore fundamental to delivering broader Government objectives. These include: supporting an urban renaissance; supporting rural renewal and economies; promotion of social inclusion and cohesion; promoting health and well being; and promoting sustainable transport choices.
- PPG24 'Planning and Noise' (September 1994) provides guidance on the use of planning powers to minimise the adverse impact of noise, advising that noise can have a significant effect on the environment and on the quality of life enjoyed by individuals and communities.
- PPS25 'Development and Flood Risk' (revised March 2010) – The aims of planning policy on development and flood risk are to ensure that flood risk is taken into account at all stages in the planning process to avoid inappropriate development in areas at risk of flooding, and to direct development away from areas at highest risk.

3.2 County Strategy, Policy and Guidance

3.2.1 Somerset and Exmoor National Park Joint Structure Plan Review (1991-2011)

The policies of the Joint Structure Plan Review (JSPR) (with one exception, Policy 53: Department of the Environment, Transport and the Regions Road Schemes) have been saved to prevent a strategic policy void prior to the adoption of the South West Regional Spatial Strategy (RSS) that was to replace Regional Planning Guidance for the South West (RPG 10), and had been made 'initial RSS' under the provisions of the 2004 Regulations. Policy 63: Utilities Development, states that provision should be made for utility developments, where they respect the environment in which they are located in terms of their scale, location and design.

3.2.2 Somerset Sustainable Community Strategy

The Somerset Sustainable Community Strategy (SCS) sets out the overall objectives for the County for the period to 2026. Aim 3 of the Strategy “Ensuring Economic Well Being” is particularly relevant however other strands dealing with affordable housing, educational attainment and community safety/ crime are also potentially relevant. Three key challenges are identified as part of Aim 3 of the Strategy Ensuring Economic Well Being:

- Broaden and strengthen the local economy – progress being measured by National Indicators 151 (overall employment rate); 166 (average earnings) and 171 (rate of new business formation);
- Plan for new sustainable communities to be built in Somerset – progress will be measured by National Indicators 154 (net additional homes provided), 155 (affordable homes delivered), 159 (supply of ready to develop housing sites) and 147 (care leavers in sustainable accommodation).
- Invest in the Somerset workforce – progress will be measured by National Indicators 163 (Level 2 qualifications), 165 (Level 4 qualifications), 117 (young people not in employment, education or training) and 148 (care leavers in employment, education and training) plus a local indicator on the number of young people completing the full apprenticeship framework.

3.2.3 Somerset Economic Strategy

The Somerset Economic Strategy which covers the period to 2015 sets out 6 key strategic objectives:

- To develop the effectiveness of Somerset’s economic voice, partnerships and strategy delivery capacity;
- To maximise the long term investment attractiveness and dynamism of Somerset’s economy;
- To increase the competitiveness and productivity of Somerset businesses;
- To realise the potential of Taunton, Yeovil and Bridgwater as economic growth centres for Somerset and the South West region;
- To revitalise the economy of Somerset’s market towns and rural communities; and
- To increase access to economic opportunities for all Somerset residents.

A series of context indicators and performance targets are set for monitoring progress.

3.2.4 Somerset Future Transport Plan

Somerset County Council has prepared a Draft Future Transport Plan (2011-2026), which sets out transport policy for the next 15 years. Technical Note 4 ‘Transport & Development’ sets out the areas of focus for major scheme funding, including the A38 Corridor Package (Bridgwater to Taunton), where improvements will concentrate on delivering journey time reliability and improved safety. Technical Note 4 also sets out HPC project specific policies:

Policy 1 – Transport requirements for new nuclear development; and Policy 2 – Evidence for the Development Consent Application.

3.2.5 Transport in Bridgwater: The Way Ahead

Published in March 2009, Transport in Bridgwater: The Way Ahead sets out a series of transport concepts and proposals for a planning timeframe to 2026. The document advises that Somerset County Council has been working on gathering evidence and assessing current and future traffic trends to feed into a long-term action plan to address existing congestion and environmental problems and facilitate growth and social vitality. The Way Ahead sets out a series of highways, public transport and cycle schemes.

3.3 Local Policy and Guidance

3.3.1 Hinkley Point C Joint Supplementary Planning Document

In recognition of the scale of the HPC project proposals and the potential for significant impacts on local communities, as well as opportunities for positive local benefits, the Councils decided to prepare a Draft HPC Project SPD (February 2011) for consultation. This is intended to guide the HPC project promoter in preparing a Development Consent Order application and any related planning applications submitted to the Councils and to inform decision making bodies on important local considerations. The SPD will supplement the local policy frameworks of WSC and SDC as outlined below.

3.3.2 West Somerset Local Development Framework

West Somerset's local policy and emerging LDF include the following relevant documents:

- West Somerset Local Plan (Adopted, April 2006) saved policies.
- West Somerset Core Strategy Options Paper (January 2010). The Core Strategy is expected to deliver 2,500 homes within the District by 2026.
- Planning Obligations SPD (Adopted, December 2009). This sets out the affordable housing, infrastructure, other development and/or financial contributions required in relation to development.

Evidence base documents include the West Somerset Strategic Housing Land Availability Assessment (SHLAA, March 2010); Taunton & South Somerset Strategic Housing Market Assessment (T&SS SHMA, March 2009); and Northern Peninsula Strategic Housing Market Assessment (NPSHMA, December 2008).

In addition, a masterplan is being prepared in relation to the growth of Williton and to inform Core Strategy policy.

3.3.3 West Somerset Corporate Policy and Economic Strategy

In respect of West Somerset Council's 18 **Corporate Objectives**, 8 relate directly to Hinkley Point and cover the topics of: Housing; Economic Development &

Tourism; HPC itself; Community Engagement; and Corporate Leadership. They focus on ensuring adequate mitigation for the negative impacts of the project maximising the benefits for the local community and providing a suitable legacy.

The **Sustainable Community** Strategy outlines a vision for West Somerset in 2020. The economic vision for the district is that:

'By 2020 there will be a thriving local economy in West Somerset. People will be able to work close to where they live. The economy will benefit from creative and knowledge based industries which do not rely on high levels of commuting. People will be suitably skilled to work in these industries and will have to continuing training to update their skills. As a result they will be well paid.'

The Strategy sets out a number of objectives under three key themes (economic, social and environment) and a range of indicators/ targets that will be used to measure progress against these objectives.

The **West Somerset Economic Strategy**. 'Delivering a New Equilibrium', was published in April 2009. The Strategy sets out the objectives for the district under the headings, People, Place and Business. The two main drivers of the strategy are:

'Quality – where a high quality of environment supports the growth of innovative, quality businesses, employing skilled, quality people.'

'Sustainability – where West Somerset could make a distinctive name for itself as a District that does sustainability rather than talks about it, making real steps to move towards and invest in the drivers of a low carbon economy.'

The economic strategy goes on to set out 12 priority objectives and a range of associated actions, for the district's economic development:

- To stimulate an aspirational, enterprising and entrepreneurial culture within West Somerset;
- To ensure that the West Somerset workforce has the skills required by business to innovate and improve their competitiveness;
- To tackle pockets of worklessness, meeting LAA targets to reduce claimant numbers;
- To ensure wide community engagement in, and scrutiny of, economic regeneration activity;
- To create a network of sustainable rural enterprise hubs to foster business growth across the district;
- To find imaginative and sustainable solutions to transport and communications challenges, particularly in relation to Taunton/ Bridgwater;
- To ensure effective, integrated and industry focused marketing of the tourism offer across Exmoor and West Somerset;
- To ensure that the built environment of West Somerset's primary settlements is of a quality that will attract private sector investment;
- To develop the quality tourism offered within the district maximising existing assets and linked to its environmental quality;

- To encourage the growth of “high value” sectors appropriate to West Somerset;
- To ensure businesses have access to the support required to enable them to innovate, grow and develop; and
- To encourage business start up and growth, including through the provision of mentoring, support and provision of appropriate workspace.

The West Somerset Economic Strategy (2009) is currently undergoing a revision. The revised strategy being published includes ‘Developing the Low Carbon Economy’ as one of the District’s Strategic Priorities.

The **Western Somerset Economic Development and Access Strategy** (December 2002) expresses some of the difficulties that are experienced in West Somerset in encouraging economic development, primarily as a result of perceived and actual poor transport accessibility. Proposals include transport related investment is designed to enhance diversification in economic activity around the Knowledge Economy and tourism.

3.3.4 Sedgemoor Local Development Framework

The Sedgemoor local policy, emerging LDF and evidence base, and Council adopted material planning considerations document includes the following relevant documents:

- **Sedgemoor District Local Plan** (September 2004) saved policies.
- **Sedgemoor Core Strategy** (Submission document, February 2011). The Core Strategy proposes that the focus for development is Bridgwater. Policy MIP1 sets out general requirements for Major Infrastructure Projects. Policy MIP 2 sets out specific criteria for any proposals for development associated with or ancillary to the Hinkley Point C project. Policy MIP 3 sets out the principles for compensation and mitigation for the impacts associated with the Hinkley Point C project.
- **Planning Obligations SPD** – this emerging SPD will set out a tariff approach to developer contributions towards infrastructure.
- **Bridgwater Gateway Design Principles** – this emerging document will set out Design Principles for land to the southwest of the Huntworth roundabout at Junction 24 of the M5.

Evidence base documents include the Strategic Housing Land Availability Assessment (SHLAA, July 2009), Strategic Housing Market Assessment (SHMA, February 2009), Bridgwater Strategic Flood Defence SPD (September 2009), North East Bridgwater Design Principles (February 2009) and Sedgemoor Green Infrastructure Strategy (Draft, January 2011).

The Council has also produced the **Bridgwater Vision** (July 2009), which sets out a multi-agency vision for Bridgwater. Approved as a material consideration in planning matters, it sets out the Council’s priorities and objectives for development within the town with the aim of creating:

‘A confident town through its strong, innovative architecture, its vibrant town centre and its revitalised neighbourhoods - encouraging a greater sense of local community, well being and civic pride.’

3.3.5 Sedgemoor Corporate Policy and Economic Strategy

The **Sedgemoor Corporate Strategy** (2009 – 2014) sets out four priorities areas for the Council of: Housing; Efficiency; Regeneration; and the Environment. Three specific challenges on which the Council wishes to focus are: Economic Growth and Regeneration; Health & Wellbeing and A Clean and Sustainable Environment. It goes on to set out a number of objectives for economic growth and regeneration. These are summarised below:

- To improve the perception of Sedgemoor and Bridgwater and champion a new era of economic regeneration and job creation;
- To raise the quality of and improving the choice of learning opportunities for the district's current and future workforce by equipping them with the skills to access higher quality employment, further and higher education;
- To improve educational attainment and enable the district's schools to plan to meet future employer needs;
- To provide support to those affected by low incomes and worklessness;
- To reconcile the conflicts between growth plans and flood risk to enable appropriate development;
- To maintain the delivery of affordable housing;
- To deliver a vibrant business environment for existing and new businesses including regenerating key town centres and improving retail facilities;
- To reduce the number of empty properties bringing them back into business or residential use;
- To encourage appropriate housing and economic development in the district's rural areas to help address rural under performance³ and to sustain local communities and services; and
- To attract external funding to enable the Council to make its priorities a reality.

The **Sedgemoor Sustainable Community Strategy** (3rd edition draft, October 2009) sets out a Vision for the place Sedgemoor will be by 2026, backed up by a series of six Aims: **S**afeguarded against the threats of climate change; **C**elebrated for **E**nergy in our people and economy; **D**istinctive due to the beauty of landscapes and heritage; a **G**ateway to the levels and moors and South West; known for a vibrant **E**conomy; people **M**otivated to achieve; providing the **O**pportunity to live well; a home to **O**ptimistic people; and a place where people **R**espect themselves.

The **Sedgemoor Regeneration Directorate Service Plan** (2010/2011) sets out the Directorate's aims and ambitions to deliver long term benefit, through creating an enabling business environment, whilst improving the quality of life for residents and visitors.

The **Sedgemoor Economic Masterplan** (2008 – 2026) sets out three key themes of Place, People and Business, all couched under a strategic theme of Leadership. Within the Business theme, the Masterplan includes a key commitment that:

'Sedgemoor will be one of the UKs leading centres for energy related business, employment and skills, with Hinkley as the foundation, and other initiatives based on renewable energy and technologies.'

The Masterplan evaluates the baseline economic conditions in Sedgemoor and sets out a transformational economic strategy to tackle the issues to improve prospects for self containment, improved economic resilience and growth, as well as measures to improve job creation and skills and target deprivation. It outlines strategic objectives and a range of associated commitments and actions. The strategic objectives are:

- To provide economic leadership for the businesses and communities of Sedgemoor in Somerset ensuring Sedgemoor effectively influences County, regional and national policies and investment programmes;
- To maximise investment attractiveness and dynamism of the economy through business infrastructure, enterprise and skills increasing Sedgemoor's contribution to the Somerset and South West economy;
- To realise the potential of Bridgwater as a regionally significant economic growth centre, benefiting businesses and communities in the wider district;
- To support the economic renewal of Sedgemoor's coastal and rural towns and dispersed communities and
- To ensure that all of Sedgemoor's communities benefit from increased economic prosperity.

The Masterplan is in the process of being refreshed to take full account of supply chain implications and employment land needs.

The District Council adopted as policy the **Sedgemoor Employment and Skills Charter** in July 2009. The Charter sets out the Council's approach to local labour agreements that it is expected will be incorporated within planning obligations or agreements, including Section 106 Agreements for major developments in the district. The local labour agreement will provide a written commitment between the Council and employers, investors and developers to "recruit and train local residents as part of the development and construction process of major developments as well as for long term job opportunities resulting from the operation of the development thereafter". The Charter was adopted to help ensure that:

- Local people benefit from new job opportunities created in major developments in the district;
- Local people are provided with opportunities to gain the skills needed for employment in growth industries; and
- Local people have access to lifelong learning and the promotion of "learning communities";
- The environmental impact of unnecessary travel is reduced by maximising local employment.

As part of a local labour agreement, developers and investors will be expected to agree to the following actions:

- Signing and implementing a Skills Pledge with the Learning and Skills Council;

- Signing and implementing a Local Employment Partnership with Job Centre Plus during recruitment with the aim of providing pre access training to help local people access new opportunities and commitment to place local people in new jobs;
- Working with Sector Skills Councils and the wider industry to develop skills both in construction and in new business operations;
- Considering ways of supporting and integrating with the Building Schools for the Future process and long term curriculum development to meet employer needs and raise local ambition; and Considering ways of working with Bridgwater College and other training providers to increase the skills levels of the workforce and raise ambition.

As part of the Charter opportunities will be sought to engage and utilise local businesses in construction and implementation.

3.4 Hinkley Point C Project Visions and Objectives

3.4.1 The Planning Performance Agreement (PPA) Vision and Development Objectives (October 2009)

A PPA has been agreed by EDFE Energy, Somerset County Council and the District Councils. The vision established within the PPA can be summarised as:

1. the development contributes to the national need for secure, low carbon electricity;
2. the development contributes significant socio-economic benefits through local employment opportunities, training and workforce development;
3. the development positively contributes to local place shaping and transformation in line with local priorities for regeneration;
4. the development is designed to comply with operational, safety and security requirements, and achieve a high quality design with environmental impacts minimised, managed and mitigated; and
5. the development is appropriately scrutinised, its environmental, social and economic impacts are robustly established, and it can be implemented with the first unit supplying electricity by end 2017 and the second by end 2018.

The PPA also sets out a series of Development Objectives that were agreed by EDFE Energy, the County Council and District Councils.

3.4.2 The Dillington Visions

During a workshop in June 2010, EDFE, Somerset County Council and the district Councils discussed and agreed a series of thematic vision statements and joint objectives for the HPC project. These relate to the following topics: Economic Development; Developing a Low Carbon Future; Education, Employment and Skills; Housing (Accommodation); and Community Wellbeing. The Dillington Visions are referenced in this response document and the full text is provided at Appendix A.

3.4.3 EDFE Corporate Ambitions and Sustainability Commitments

EDFE has set out six corporate ambitions to frame objectives for each part of its business. These are:

- Zero harm;
- First choice for customers;
- Leading the way in Nuclear Power Generation;
- Strong financial performance;
- High performing people;
- Leader in Sustainability.

EDFE has also set out its corporate (voluntary) sustainability commitments in five areas:

- Reducing carbon and waste;
- Delivering low-carbon nuclear responsibly;
- Helping our customers;
- Building a world class culture; and,
- Serving our communities.

This includes a commitment to reducing the carbon intensity of the company's electricity supply by more than 60% by 2020 (compared to a 2006 baseline). EDFE Energy sets out HPC project specific objectives in their Stage 2 consultation documents.

4 Workforce, Employment and Skills

4.1 Workforce Numbers

4.1.1 Summary of Key Changes

Stage 2	Proposed Changes
5,000 people working on-site at peak construction. It was predicted that between 30 and 40% of the workforce would be home-based.	5,600 people working on-site at peak construction, with between 20,000 and 25,000 Full-Time Equivalent (FTE) jobs created. It is predicted that 5,000 of these jobs would be filled by Somerset residents (i.e. around 20% of the workforce would be home-based).

The revision of the workforce numbers is unlike many other aspects of the Proposed Changes in so far as it alone does not constitute a proposal, rather it is the underpinning assumption that will heavily influence the transport and accommodation strategy and the multitude of impacts related to these. The Councils are therefore concerned that revised Preliminary Environmental Information has not been provided to identify the significant environmental

impacts associated with this change in the assumption and to consult on any necessary solutions or mitigation measures required.

4.1.2 Policy and Guidance

Excerpts from county and local policy, strategies and guidance of particular relevance are:

- The Somerset SCS sets out a key challenge to broaden and strengthen the local economy.
- The Somerset Economic Strategy states a strategic objective ‘...to increase access to economic opportunities for all Somerset residents.’
- WSC’s SCS seeks ‘to increase economic equality and social engagement.’
- The WSC Economic Strategy includes a priority objective to ‘tackle pockets of worklessness.’
- SDC’s Corporate Strategy states an objective to ‘to improve the perception of Sedgemoor and Bridgwater and champion a new era of economic regeneration and job creation.’
- The SDC Economic Masterplan seeks ‘to ensure that all of Sedgemoor’s communities benefit from increased economic prosperity.’
- SDC Core Strategy (Submission) Policy D11 sets out support for employment proposals that provide ‘local and higher quality job opportunities.’
- The PPA includes an objective that: development contributes significant socio-economic benefits through local employment opportunities, training and workforce development.
- The Dillington Vision for Economic Developments sets out jointly agreed aims ‘...to ensure that the HPC project acts as a key driver for the achievement of a more dynamic, entrepreneurial, inclusive and sustainable economy in Somerset and the wider region’, and to ‘...support a growing, highly skilled workforce which can underpin a more competitive and productive business base.’
- The Dillington Developing a Low Carbon Future Vision sees ‘...Somerset as a centre of excellence for low carbon use, with a strong business and educational reputation for low carbon and environmental technologies. Priorities include ‘...creating a “green collar” workforce.’

4.1.3 Councils’ Response

Good progress has been made in relation to workforce planning assumptions since the Stage 2 consultation, marked by the decision of the Councils to jointly agree key workforce assumptions earlier this year, as set out in the supporting EDFE technical paper entitled Workforce Profile Report earlier this year. The revision to peak workforce has therefore been agreed.

Aligning with the strategy and policy objectives set out above, the Councils’ primary concern is that of maximising the local supply of labour, especially from groups who are currently not in work. A key issue, therefore, is the degree to which the numbers of workers predicted for the WSC and SDC administrative areas can realistically be achieved. Whilst appreciating that there are

methodological problems involved, the Councils have investigated the propensity to supply labour locally for their administrative areas and what that might mean for different communities.

In addition to outreach in areas of high deprivation and worklessness (see Employment Brokerage section below), the Councils will also seek to increase the potential for higher skilled positions, such as 'professionals' and 'Mechanical and Electrical' (M&E), to be filled by people currently living in WSC and SDC. The EDFE Workforce Profile Report sets out an analysis of the home based workforce by occupational type across the 90 minute commuting zone (revised CDCZ).

Under conditions where the occupational requirements of the HPC project were to be evenly distributed across the CDCZ then the latest claimant data suggests that problems would be experienced in finding sufficient people from within the pool of unemployed people to fill available positions. Analysis suggests that a match is more likely to be achieved nearer Bristol where the labour market is bigger.

For M&E operatives, the overall problem is much more acute across the whole CDCZ. The ratio of M&E workers for each HPC project position is only 0.2 for WSC and 0.3 for SDC. Ratios remain relatively low across Greater Bristol 1.3 and Devon 1.1. With such a high proportion (59% at peak) of the HPC project positions expected to fall within the M&E occupational type, this is considered to be a key focus for education and training while the more civil engineering based preliminary site works progress.

The Councils consider there is an important opportunity to substantially increase the number of people with M&E qualifications and experience; a skill set that is viewed as very relevant to the wider objective of fostering a 'Heart of Somerset Low Carbon Cluster'. Ensuring that local training and skills organisations have the resources and facilities to respond to this challenge will be important and this is a theme picked up in the Skills Investment in Somerset Colleges section below.

One risk of failing to provide appropriate education and training will be the need for more non home based workers to migrate to the area, with associated accommodation and transport needs. A further significant risk is that the demand for the current scarce M&E workforce will exhaust local supply at the expense of existing companies, who are unable to compete with the wages on offer within the HPC project.

Whilst it is accepted that markets will adapt to changing circumstances, it is the Councils view that there would be implications for local labour markets that may disadvantage local employers. This logic suggests a need for local companies to backfill positions where key workers have been lost to the HPC project. Ideally companies are likely to seek some one of equivalent productivity to the people lost. Our analysis suggests that this might be hard to achieve especially if companies are used to recruiting from a localised labour pool. The backstop position is to "grow" the skill internally by training "in house" people to achieve the required level of skill and productivity. Local companies do, however, face the same dilemma that many smaller companies face in losing people once they have developed the skill. This is danger is heightened when the wage premium is significant elsewhere.

The opportunities and threats for the local labour market posed by the HPC project are highlighted by the M&E occupational type and demonstrate the

importance and urgency with which the measures proposed by EDFE need to be implemented.

4.1.4 Consistency with EDFE Supporting Information

The primary source document for the revisions to workforce numbers is the Draft Workforce Profile Report (February 2011) published alongside the Proposed Changes consultation. Secondary round effects on existing employers have largely been discounted in the Glasson report. .

4.2 Employment Brokerage

4.2.1 Summary of Key Changes

Stage 2	Proposed Changes
Reference to Employment Brokerage and initiatives to extend opportunities to hard-to-reach groups. Roll-out of a Jobs Ready programme.	EDFE working with Jobcentre Plus to allow people to gain access to vacancy and training information.

4.2.2 Policy and Guidance

Excerpts from county and local policy, strategies and guidance of particular relevance are:

- The Somerset Economic Strategy states a strategic objective ‘...to increase access to economic opportunities for all Somerset residents.’
- WSC’s SCS seeks ‘...to increase economic equality and social engagement’ and ‘...develop a well trained, adaptable, local workforce’
- The WSC Economic Strategy includes a priority objective to ‘...tackle pockets of worklessness’
- SDC’s Corporate Strategy states an objective ‘...to provide support to those affected by low incomes and worklessness.’
- The SDC Economic Masterplan seeks ‘to ensure that all of Sedgemoor’s communities benefit from increased economic prosperity.’
- SDC Core Strategy (Submission) Policy D11 sets out support for employment proposals that provide ‘local and higher quality job opportunities.’
- The PPA includes an objective that: development contributes significant socio-economic benefits through local employment opportunities, training and workforce development.
- The Dillington Vision for Education, Employment and Skills seeks ‘...to ensure the HPC development maximises employment and skills opportunities for local people, whilst inspiring young people to achieve and seek to follow careers in the science, technology, engineering and manufacturing sectors.’ Under this vision statement, a priority action concerned the establishment of ‘...an employment brokerage that opens up access to employment opportunities to local people.’ A further priority action is to ‘...support our community partners to tackle worklessness, by together, providing pathways

that provide opportunities for skilling, which lead to sustainable employment' and 'to ensure that our supply chain partners recruit, train and inspire local people.'

4.2.3 Councils' Response

The Council welcomes and supports the steps made by EDFE to forge a working partnership with Jobcentre Plus in delivering the employment brokerage. It is acknowledged that this partnership should afford access to job opportunities that will arise from the HPC project for those persons actively seeking work.

The employment brokerage is still at a formative stage and it is considered that there are three areas of focus for future development:

- Integration of separate initiatives so that a more comprehensive service can be delivered to the client groups. Jobcentre Plus has committed to provide the central function of the brokerage service. Agreement has also been reached to integrate the employment brokerage with similar employment and skill access initiatives (e.g. the Morrisons/DHL local employment and training programme). In order that a greater range of overall outcomes can be achieved, additional partner agency resources are being sought from Construction Skills and local authorities to ensure efficient coordination. Further progress on this approach is welcomed.
- The engagement and involvement of the Council, voluntary and community sectors operating in areas of high deprivation to support access to employment through outreach. Building the capacity of the Council, third sector and the effective use of existing voluntary and community networks has proved to be an effective pathway to identify, engage and support "hard to reach" groups and to enter into training, learning and employment and is considered to be "good practice" by many practitioners and academics.
- Promoting enterprise, social enterprise and self employment as an alternative to mainstream opportunities

With respect to outreach activities, the Councils will expect the EDFE business/operational plan for the Employment Brokerage to demonstrate how it will reach into deprived communities in West Somerset and Sedgemoor. The Local Authorities are keen to help shape the outreach pathway with a view to putting in place a Service Level Agreement to deliver a defined level of service, targets and monitoring arrangements, coordinating a multi-agency response to meeting individual needs at a neighbourhood level. The Councils have strong links with communities and community centres, Homes in Sedgemoor and wider networks coordinated through the Local Strategic Partnership.

The Councils would wish to understand the business/operational plan for the brokerage service and develop the outreach services as part of this.

The establishment of a HPC project information office in Bridgwater town centre is promoted as a means of providing support services to workers, an accessible information point for local people, as well as signposting to the brokerage, advertising training and job opportunities. It is expected that the information office could act as 'One Stop Shop' contact point for the project, which would also be capable of dealing with housing enquiries and members of the local community who wish to raise concerns or make complaints.

4.2.4 Consistency with EDFE Supporting Information

In paragraph 4.1.2 of the Draft Workforce Profile Report, a reference is made to 'active training and brokerage measures to support local recruitment in both Sizewell B and Flammerville-3.'

4.3 Somerset College Skills Investment

4.3.1 Summary of Key Changes

Stage 2	Proposed Changes
Reference to establishing: Constructions Skills Centre in Sedgemoor Construction Apprenticeship Learning Hub in West Somerset Specific advanced skill programmes to improve knowledge and skill base of the workforce Partnership with local schools and West Somerset College to localise education plans throughout the community A Construction Workforce Development Strategy	Commitment to the following skills investment: £3mil in Energy Skills Centre £1.5mil in Construction Skills Centre £1.6mil at West Somerset Community College Apprenticeships available through the Construction Skills Centre and Hinkley Ready Skills Project instead of through an Apprenticeship hub

4.3.2 Policy and Guidance

Excerpts from county and local policy, strategies and guidance of particular relevance are:

- The Somerset Economic Strategy states a strategic objective '...to increase access to economic opportunities for all Somerset residents.'
- WSC's SCS seeks '...to widen participation in learning' and '...develop a well trained, adaptable, local workforce'
- The WSC Economic Strategy includes a priority objective to '...ensure that the West Somerset workforce has the skills required by business to innovate and improve their competitiveness'.
- SDC's Corporate Strategy states an objective '...to raise the quality of an improving the choice of learning opportunities for the district's current and future workforce by equipping them with the skills to access higher quality employment, further and higher education.'
- The SDC Economic Masterplan seeks 'to ensure that all of Sedgemoor's communities benefit from increased economic prosperity.'
- SDC Core Strategy (Submission) Policy D11 sets out support for employment proposals that provide 'local and higher quality job opportunities' and '...improves the skills of the resident workforce.'
- The Bridgwater Vision sees Sydenham and Bower becoming '...a mixed, residential, employment and educational area with a focus on the East Bridgwater Community School and Bridgwater College and their role in the area, linked to new employment and knowledge based industries.'

- The PPA includes an objective that: development contributes significant socio-economic benefits through local employment opportunities, training and workforce development.
- The Dillington Vision for Education, Employment and Skills seeks ‘...to ensure the HPC development maximises employment and skills opportunities for local people, whilst inspiring young people to achieve and seek to follow careers in the science, technology, engineering and manufacturing sectors.’ Under this vision statement, priority actions are: ‘...to invest in education initiatives which will raise the aspirations of the young people in West Somerset, Sedgemoor and across the County to improve retention and increase participation’; ‘...to create a future workforce through the provision of apprenticeships and training opportunities in the construction supply chain’; and ‘...to ensure that our supply chain partners recruit, train and inspire local people.’

The Draft HPC project SPD states that the Councils expect the development and implementation of Employment and Skills Charters to support and improve local access to jobs and training. Measures within the Sedgemoor and West Somerset districts should include the ‘...timely developer support for the expansion of existing higher education and further education facilities to facilitate the HPC project and its associated benefits during construction and operation.’

Bridgwater College could also be considered as a delivery agent for relevant mitigation programmes for community outreach, business support and in training and placement of tourism and hospitality students to the visitor centre or accommodation centres.

4.4 Councils' Response

The Councils welcome and support the growth in the overall scale of funding committed to support the creation of training infrastructure at Bridgwater College and West Somerset Community College. Areas where further information and scheme development should be focussed are:

- Further information is requested on how many local people will receive training as a result of this investment, or the relationship with the apprenticeship scheme also referred to in the Proposed Changes. We recognise that until details and timing of contracts are made available, this will be difficult to assess.
- With the changes in funding regimes, organisations and agencies involved in training, the Councils would like to see details of the financial arrangements for delivery.
- The Councils consider that there is a need for further information and commitment to measures to ensure that there is the local training and skills infrastructure to respond to the need for more M&E operatives (see response to workforce numbers above). Opportunities may exist for refresher courses for people who already have some level of skill or experience. The lead time to creating site competent people in the technical disciplines may be problematic and is a cause for concern, especially when local residents will be competing for work with non home based workers who may be regarded as ‘work ready’.

- The Councils would like to see more evidence on how EDFE will use its skills investments to secure enterprising activity in the local economy, which could be of great importance at a time when basic provision and support frameworks are being withdrawn . Both Councils see enterprise education, training, development and support as a key mechanism in maximising benefits from the HPC project. Realising these advantages would require a concerted effort, including support for local people to create and grow enterprises that can attract the HPC project ‘construction worker pound’. There is an opportunity for local people to supply a range of lower skilled needs of the workforce and EDFE more generally such as on site catering, local transport, maintenance and repair. These services should be built around the associated development and main site locations for the project and extend into the operational phase.

Specific actions supporting this should include:

- Provision of “face to face” business advice to existing enterprises seeking to plan for expansion around opportunities created by the HPC project;
- In the light of a weakened bank lending environment, support on the matter of small firms access to finance would be required to enable firms to invest in new capacity;
- Provision of training and support to individuals wishing to start up small businesses in response to an improved trading environment created by the indirect effects of the HPC project;
- A plan to maximise operational procurement opportunities for local business including opportunities for transport, cleaning, security, corporate hospitality, accommodation providers and specialist education; and
- Provision of training to disadvantaged and other groups to form social enterprises capable of supporting their communities in relation to enhanced trading conditions or the delivery of certain community focused interventions.
- Support for apprenticeships in businesses who fail to retain their staff as a result of the project.
- EDFE should include contract clauses related to the minimisation of food miles and sourcing sustainably produced inputs that should provide a competitive advantage to local enterprises. EDFE should also introduce audit systems to prove compliance.

4.4.1 Consistency with EDFE Supporting Information

In paragraph 4.1.2 of the Draft Workforce Profile Report a reference is made to ‘...active training and brokerage measures to support local recruitment in both Sizewell B and Flammannville-3.’ No material has been presented to predict the likely distributional consequences of the workforce assumptions.

4.5 Apprenticeships for Local People

4.5.1 Summary of Key Changes

Stage 2	Proposed Changes
Reference to a Operational Stage Workforce	Apprenticeships available through the

Stage 2	Proposed Changes
<p>Development Strategy.</p> <p>Reference to working with contractors to make apprenticeship opportunities available during the construction phase.</p> <p>Creation of a construction apprenticeship learning hub located in West Somerset</p> <p>Work with supply chain partners to make available further apprenticeship</p> <p>Running an annual apprenticeship fair</p>	<p>Construction Skills Centre and Hinkley Ready Skills Project instead of through an Apprenticeship hub</p> <p>Apprenticeships for local people, with aim that 200 to 300 of the HPC operational staff will be sourced through this 4 year programme.</p>

4.5.2 Policy and Guidance

Policy and guidance relevant to skills investment in Somerset Colleges is also applicable here.

4.5.3 Councils' Response

The Councils welcome the commitment to a specific number of apprenticeships in the local economy which reflects the changes in the Government's training priorities. The Councils are also keen to ensure apprenticeships are promoted throughout the supply chain and skills areas across all phases of the HPC project, and through business support mitigation initiatives. The Councils' wish to see active measures taken in EDFE's forthcoming Implementation Plans that demonstrate how procurement processes and contract monitoring will be used to maximise opportunities within the supply chain and the operation of the plant.

4.5.4 Consistency with EDFE Supporting Information

No additional material has been presented by EDFE in the supporting information related to attracting economic development opportunities into the area.

4.6 Stage 2 Issues Not Addressed

Although there are some welcome positive steps set out in the Proposed Changes, the Councils wish to reiterate the urgency with which employment, skills, training, business and support and outreach initiatives need to be established if shared local labour objectives are to be achieved for the early stages of construction, and up-skilling is to be achieved for the later stages where there is a scarcity of the right skills. A failure to do so would have significant knock-on effects for the transport and accommodation strategies (and the magnitude of related impacts) and a further reduction in socio-economic benefits.

Issues raised in the Councils Stage 2 Report where there is little or no evidence of progress are:

- **Labour market** - With so many people likely to come from the existing workforce there is inevitably going to be an issue around back filling jobs released as a result of existing workers "trading up" to take advantage of the wage premium (Stage 2 proposes that the project will be paying 178% of the current Sedgemoor average wage).

- **Enterprise development** - In the Councils Stage 2 report, the issue of support for enterprise development was also raised.

5 Helping the Local and Regional Economy

5.1 Local businesses and Hinkley Point C supply chain

5.1.1 Summary of Key Changes

Stage 2	Proposed Changes
Reference to measures such as: KPIs to measure involvement of local businesses Database of businesses compiled with Somerset Chamber of Commerce Appointment of Local Supply Chain Officer Appointment of EDF Energy Procurement Officer	Initiatives to maximise jobs and businesses are: Local Business Engagement Forum. HPC Supply Chain website 2 Supplier Days in Somerset Run 'Support Seminars' for local businesses Run 'Meet the Buyer' events

5.1.2 Policy and Guidance

Excerpts from county and local policy, strategies and guidance of particular relevance are:

- The Somerset Economic Strategy states a strategic objective '...to revitalise the economy of Somerset's market towns and rural communities.'
- WSC's SCS seeks '...to increase economic equality and social engagement.'
- The WSC Economic Strategy includes priority objectives '...to stimulate an aspirational, enterprising and entrepreneurial culture within West Somerset' and '...to ensure businesses have access to the support required to enable them to innovate, grow and develop.'
- SDC's Corporate Strategy states an objective '...to improve the perception of Sedgemoor and Bridgwater and champion a new era of economic regeneration and job creation.'
- The SDC Economic Masterplan seeks '...to maximise investment attractiveness and dynamism of the economy through business infrastructure, enterprise and skills increasing Sedgemoor's contribution to the Somerset and South West economy.' The Sedgemoor Economic Master-plan (2008 – 2026) sets out three key themes of Place, People and Business, all couched under a strategic theme of Leadership. Within the *Business theme*, the Master-plan includes a key commitment that: 'Sedgemoor will be one of the UKs leading centres for energy related business, employment and skills, with Hinkley as the foundation, and other initiatives based on renewable energy and technologies.'
- SDC Core Strategy (Submission) Policy D11 sets out support for employment proposals that '...encourage a diverse, robust, thriving and resilient (in terms of both climate change and economic resilience) economy;

- The PPA includes an objective that: development contributes significant socio-economic benefits through local employment opportunities, training and workforce development.
- The joint Dillington Vision for Economic Development is ‘...to ensure that the Hinkley development acts as a key driver for the achievement of a more dynamic, entrepreneurial, inclusive and sustainable economy.’ The Council believe that this Vision will only be realised where proactive measures are taken to ‘...establish positive procurement practices and support to ensure local businesses can fully participate in the supply chain by having access to and the ability to compete for HPC contracts.’

5.1.3 Councils' Response

Work to establish a Business Engagement Forum is welcomed and supported by the Councils, however, we would wish to explore integration or evolution of existing forums to avoid duplication.

There remains a lack of clarity on the roles of different agencies as set out in Executive Summary. The Business Engagement Forum comprises a range of organisations who have assisted in the development of the initiatives referred to in the Proposed Changes document. Moving forward from the current arrangement of monthly meetings, the long term success of the Forum will be predicated on effective partnership working. A priority action should therefore be to review the membership, terms of reference and governance arrangements of the Forum.

Both Councils see the project as opening up work opportunities for local people both directly and indirectly (through the supply chain) to raise the employment rate. Enterprise, existing businesses and new firms can play a valuable role in creating work opportunities including those outside high technology that arise as a result of a large migrant workforce spending part of their payroll in the local economy. No specific recognition is given in the EDFE Proposed Changes document to the possibility that ‘low tech’ businesses may establish in the accommodation, catering, retailing and cultural sectors to take advantage of worker expenditure in the area. These businesses may need support at a time when intervention mechanisms are being cut back.

The Councils will continue to support business investment and supply chain development, both in terms of their statutory planning and economic development functions. They will also support the development of bespoke advice and business finance by other partners targeted at supply chain companies or in support of social enterprise. Specific enterprise support actions are set out in the section 4.4.

5.1.4 Consistency with EDFE Supporting Information

No additional material has been presented by EDFE in the supporting information related to supporting local businesses.

5.2 Attracting economic development into Somerset

5.2.1 Summary of Key Changes

Stage 2	Proposed Changes
<p>Reference to developing a joint strategy and action plan for promoting Low Carbon Cluster in the area.</p> <p>Proposal for Public Information Centre (PIC) at Hinkley Point.</p>	<p>Proposed measures are:</p> <p>Work with Into-Somerset the county's inward investment organisation to attract new companies into Somerset</p> <p>Develop the Low Carbon Cluster with SCC</p> <p>Tourism Conference with tourism providers</p> <p>HPC Public Information Centre (PIC)</p> <p>Education of people of all ages to promote science, technology, engineering and mathematics for the next generation of employees</p>

5.2.2 Policy and Guidance

Excerpts from county and local policy, strategies and guidance of particular relevance are:

- The Somerset Economic Strategy states a strategic objective '...to maximise the long term investment attractiveness and dynamism of Somerset's economy.'
- WSC's SCS seeks '...to make West Somerset a quality location for business' and '...to increase the income from tourism.'
- The WSC Economic Strategy includes priority objectives '...to create a network of sustainable rural enterprise hubs to foster business growth across the district' and '...to develop the quality tourism offered within the district maximising existing assets and linked to its environmental quality.' In draft refreshed version of the Economic Strategy there is a focus on developing the low carbon economy.
- SDC's Corporate Strategy states an objective '...to improve the perception of Sedgemoor and Bridgwater and champion a new era of economic regeneration and job creation.'
- Sedgemoor's Economic Masterplan (2008-26) sets out a key commitment that 'Sedgemoor will be one of the UK's leading centres for energy related business, employment skills, with Hinkley as the foundation, and other initiatives based on renewable energy and technologies.' A strategic objective of the Masterplan is '...to realise the potential of Bridgwater as a regionally significant economic growth centre, benefiting businesses and communities in the wider district.'
- SDC Core Strategy (Submission) Policy D3 states that 'the Council will encourage the use of sustainable construction techniques that promote the reuse and recycling of building materials, maximise opportunities for the recycling and composting of waste on all new development proposals (residential and non-residential) and reduce CO2 emissions.' Policy D12 advises that proposals for tourism related initiatives including accommodation will be supported where they contribute to the following objectives: improving

the quality and diversity of the tourism offer and enhancing the image of the area as a tourism location; and improving the resilience of the local economy through the provision of higher quality local job opportunities and extending the tourism season.'

- The draft HPC SPD states that the Councils expect the HPC project promoter to contribute to economic development in the area through support for a Heart of Somerset Low Carbon Energy Cluster including a Delivery Plan.
- The PPA includes objectives that '...the development positively contributes to local place shaping and transformation in line with local priorities for regeneration' and '...the development is appropriately scrutinised, its environmental, social and economic impacts are robustly established...'
- The Dillington Economic Development Vision Statements includes 'priorities for the vision' including a desire to '...accelerate the move to a high value, knowledge based economy, including the growth of an emerging energy, environment and related technology business cluster.'
- The Dillington Vision Statements also include 'Developing a Low Carbon Future' as an outcome of the HPC project, where the objective would involve the development of '...Somerset as a centre of excellence for low carbon use with a strong business and educational reputation for low carbon and environmental technologies.' Priorities for achieving this vision statement include: '...developing low carbon skills training in Somerset and creating a 'green collar' workforce;' and '...developing a national reputation for Somerset as a centre of excellence for low carbon energy and resource management.'

5.2.3 Councils' Response

Inward Investment and the Low Carbon Cluster

The Councils attach a high priority to using the project as a means of accelerating a move to high value knowledge based economy particularly in relation to low carbon industries. This policy driver is articulated in a number of the local strategies as summarized above. The Local Enterprise Partnership (LEP) Prospectus prioritises investment in potential growth sectors including low carbon energy generation (notably nuclear power and renewables) that can create and sustain new private sector jobs. EDFE input and support for the development of the low carbon business cluster is therefore welcomed.

The HPC project can help secure a significant number of jobs towards the achievement of local economic growth both directly through its direct operational phase and through activities attracted as inward investment supporting the national nuclear new build programme.

As points of clarification with respect to Into Somerset and work to develop a low carbon cluster:

- Into Somerset (IS) is not the County Council's inward investment organisation. IS is administered by the County Council. IS was jointly set up and is supported financially and otherwise by the District and County Councils and increasingly private sector investors, and it has both an inward investment and place marketing function.

- It is important to clarify that EDFE will need to work closely with the District Councils, in addition to Somerset County Council, on an economic development strategy that positions Bridgwater at the centre of a low carbon business cluster.
- The delivery of the low carbon business cluster will need to demonstrate that new and existing businesses in West Somerset and Sedgemoor can also reap the benefits to its economy – the delivery of super-fast broadband to rural communities in West Somerset and to Sedgemoor will be an essential component of achieving this objective.

Moving forward with the development of the low carbon cluster, the District Councils consider the following to priority actions:

- There needs to be alignment of the cluster delivery plan with the emerging Core Strategies for the two districts, with specific consideration to how strategically important sites could be promoted and delivered. For example, the delivery of Bridgwater Gateway and an Energy Park on the former Royal Ordnance Factory at Puriton. These are considered to be a key catalyst in enabling Sedgemoor to realise its potential as a leading centre for renewable energy and low carbon technologies (Spatial Vision for Sedgemoor).
- Associated development for the HPC project should provide opportunities for demonstrator projects and investment in renewable and low carbon technologies, such as deployment of on-site renewables and electric vehicle infrastructure, generating further 'critical mass' in the energy industry within Somerset. This approach would be consistent with the site proposals set out at Stage 2 which refer to deployment of these technologies.
- The strategic relationship between the Enterprise Centre project being developed with West Somerset Community College, the HPC project and the low carbon business cluster will again be an important component of ensuring that West Somerset is able to benefit from this important project.

The operational reactors alone contribute an estimated 900 jobs towards the growth of employment in knowledge based activities. Further employment could come from the low carbon cluster initiative through the attraction of inward investment consistent with the ultimate vision

Tourism

The District Councils will continue seek to maintain and enhance the attractiveness of their areas as a visitor destination and support, in principle, the development of a Public Information Centre (PIC) for Hinkley Point as a means of creating a further attraction for visitors. Achieving a 5% increase in employment as suggested in "Towards 2015 - Shaping Tomorrow's Tourism" means increasing employment in tourism within WSC and SDC by around £16million and creating an additional circa 400 jobs by 2015. The Councils would welcome the opportunity for further dialogue around the PIC proposals and how these could be mutually supportive with existing and planned tourism attractions and facilities.

Although EDFE have held a tourism workshop (as referred to in the Proposed Changes), further work is required to understand the potential impacts of the HPC project for this sector, particularly in relation to transport and the implications of congestion. The Councils remain concerned at the possible damage to the day

visitor market during the construction phase of HPC project, an enduring concern raised at the recent workshop jointly hosted by the Councils and EDFE. The Councils are concerned that the construction phase may lead to a permanent diversion of leisure visitors from the area leading to a leakage of visitor expenditure out of the area to competitor locations. This effect is likely to come from visitors experiencing a congested road network especially as a result of likely accidents on the network. The Councils do not believe that EDFE have considered as part of their Proposed Changes proposals or as part of their stage 2 proposals the implications of the project on the tourism sector and the need to commit to measures and initiatives to mitigate and compensate for these impacts.

The Councils are also keen to ensure other important sectors of the existing economy are accounted for in the development of the HPC project. Food and drink, land based industries and logistics are important employers both in their own right and collectively in terms of connections between industries e.g. specialty foods and tourism. The Councils are keen to work through these issues with EDFE, in order that appropriate mitigation and compensation safeguards can be put in place.

Mitigation measures for impacts on the tourism economy include:

- Assistance with marketing the area to key visitor markets at key points during the progression of the project reinforcing the message that the area is still open for business. This assistance would take the form of support for tourist information provision, the production of campaign materials including all forms of media (including TV, Internet, etc);
- Funding capacity for the monitoring of impacts on occupancy and expenditure over the period of construction;
- Assistance to facilitate small businesses access finance to improve and upgrade their accommodation for the purposes of fulfilling expected demand from the project;
- Focused business advice for the tourism sector recognizing the value of specialist knowledge in the sector;
- Investment in tourism trails.
- A plan to exploit the business tourist potential during and after construction relating the experience of new nuclear build to a variety of local authorities; public agencies and private businesses interested in understanding the lessons that can be learned from the project when applied to their areas.

The Councils very much see the importance of local knowledge and already developed local relationships with providers when considering how to manage worker interaction with Tourist Accommodation. The opportunity to link with existing Visitor Information Centres, such as the centre in Minehead and the Visitor Centre at the Hinkley Point C site should not be lost.

5.2.4 Consistency with EDFE Supporting Information

No additional material has been presented by EDFE in the supporting information related to attracting economic development opportunities into the area.

6 Accommodation Proposals

The Councils welcome the publication of EDFE's first draft accommodation strategy. In particular their willingness to work with developers and the local authorities to facilitate new permanent build housing development and existing property refurbishment is welcomed. The Council would encourage EDFE to go even further to deliver multiple accommodation options to ensure that their workforce will have a sustainable supply of suitable accommodation.

The approach set out in the Stage 2 update and in the draft Accommodation Strategy, whilst not yet fully developed, still has the potential to allow EDFE to reduce the scale of the campus sites even further. The Councils continue to actively encourage this approach in order to establish a lasting legacy of permanent build housing development that can meet EDFE's short term needs plus the long term needs of communities in Somerset.

This sub-section provides a brief refresh on planning context before setting out details of the Councils' response to the Stage 2 update proposals plus the publication of the draft Accommodation Strategy.

6.1 Summary of Proposed Changes

EDFE's Proposed Changes consultation material for accommodation describes an update on their approach to use of existing accommodation supplies, plus an update on changes to the purpose built campus sites. It also comments on the organisation's current willingness to explore delivery of new housing, to establish a housing fund and to set up an accommodation office.

Table 6.1 Summary of Proposed Changes.

Proposal	EDFE Stage 2 Preferred Proposals	EDFE Stage 2 Proposed Changes	Council's Approach in Draft HPC SPD
Existing Accommodation	Of 3,500 workers moving to the area at peak construction, 1,960 would live in existing accommodation (owner occupied, private rented; latent supply) and tourism accommodation (hotels, B&B and caravans).	Of 3,700 workers moving to the area at peak construction, 2,000 would live in existing accommodation (owner occupied, private rented; latent supply) and tourism accommodation (hotels, B&B and caravans).	SPD approaches support use of existing accommodation, but seeks to monitor use of tourism and private rented to ensure that any adverse effects on these markets are avoided and/or fully mitigated. Provision of caravan accommodation supported where it complies with existing policy and is demonstrated to be viable as a permanent tourism use.

Proposal	EDFE Stage 2 Preferred Proposals	EDFE Stage 2 Proposed Changes	Council's Approach in Draft HPC SPD
Purpose-built Campuses	A total of 1,925 bedspaces proposed at: Hinkley Point (700 beds); Bridgwater A (1,075 beds); and Bridgwater C (150 beds). All temporary build with exception of Bridgwater C.	A total of 1,510 bedspaces proposed at: Hinkley Point (510 beds); and Bridgwater A (850 beds). Bridgwater C less likely to be developed, in which case all campus buildings would be temporary.	SPD promotes provision of permanent accommodation buildings in existing settlements. Further comment provided below in relation to specific proposals.
Hinkley Point On-site Campus	Proposals for temporary development: 700 bedspaces Common Room Café 2 x shops Medical facility/clinic Campus office Small launderette 2 x lounge bars 2 x flexible use / education rooms Games facility Indoor sports hall and gym 1 x large sports pitch and 4 x 5-aside pitch 545 car parking spaces	Proposals for temporary development: 510 bedspaces Amenity building to house: canteen, shop, bar, launderette and games room Car park repositioned to reduce noise for nearby existing properties (number of spaces not stated)	SPD seeks to minimise the scale of the on-site campus (up to 100 bedspaces) to provide only essential on-site accommodation. Medical facility / clinic viewed as important on-site facility. Promotes integration of facilities such as amenity buildings with potential permanent development, such as Hinkley Point PIC. Encourages provision of sports facilities where they could be retained as permanent legacy uses – potentially Cannington, plus enhancement of existing facilities at Stogursey.
New Housing	No permanent housing proposals at Stage 2	States that “we are exploring whether we can work with local authorities to facilitate housing development and property refurbishment.”	SPD identifies potential permanent housing sites in West Somerset and Sedgemoor.
Housing Fund	Not proposed at Stage 2	States that EDFE is proposing additional support for housing in the local areas by the establishment of a £5million housing fund.	The legacy opportunities described in the SPD will form the basis for discussions on the application of the Housing Fund.
Accommodation office	Not previously proposed	EDFE confirms that it will establish an accommodation office	The accommodation office is not discussed in the SPD but is welcomed by the Council subject to further discussions on its location and role.

6.2 Policy and Guidance

It is unclear in the documents issued by EDFE to date what level of consideration has been given to national and local planning policies. This short section highlights the key policy and guidance drivers that need to be given consideration in the context of any development proposal, not least of a scale proposed for the HPC project including associated development.

6.2.1 West Somerset District Council

In West Somerset, the planning policy context identifies the district's settlement hierarchy with Williton, Watchet and Stogursey providing rural centres where development is considered acceptable subject to size, function, characteristics and constraints. Housing development is supported in Williton and Watchet subject to the avoidance of loss of land for other uses. Development outside of defined limits of the identified settlements is only permitted where it benefits economic or social activity without leading to increases in car travel and where environmental improvements can be achieved. Affordable housing policies are in place reflecting the significant shortfall of affordable housing in the district as a whole.

In addition to the existing policy framework, the Council is working towards developing its Core Strategy at present and a supporting body of evidence is being developed including for the future growth of Williton that will have relevance to EDFE in terms of delivering worker accommodation and the opportunity to deliver affordable housing in the District.

Overall, sustainable approaches to accommodation provision in West Somerset are a major priority for the Council and for local communities. EDFE has the potential to support the delivery of planning policy objectives for sustainable growth in key settlements close to the Hinkley Point site and is actively encouraged to pursue and commit to these opportunities and help to dramatically reduce the scale of the on-site accommodation campus and support longer term provision of affordable housing.

6.2.2 Sedgemoor District Council

Sedgemoor District Council's policy framework as described in the published existing local plan and draft Core Strategy encourages a sustainable and considered approach to development.

In the context of the accommodation proposals, that EDFE is still in the process of developing, the Council would highlight in particular that Bridgwater is the focus for Sedgemoor's housing growth. Policies promote: high quality and inclusive design which amongst others promote encouragement of social interaction and healthy environments; delivery of mixed housing supported by sustainable infrastructure that is compatible with local character; provision of affordable housing to meet local needs; recognition of Eastover in Bridgwater as a Housing Renewal Area; and sustainable development including promotion of local distinctiveness.

In addition to the existing and emerging statutory frameworks for development, Bridgwater Vision and in the North East Bridgwater design principles are of particular relevance to EDFE. When considering accommodation provision these

guiding principles supplement policy frameworks and are central to achieving a vision for sustainable regeneration.

As noted to EDFE previously, it is essential that due regard is given to the policy and guidance frameworks when taking forward accommodation proposals in Sedgemoor, both permanent and temporary.

6.3 Existing accommodation

The Councils are concerned about a range of risks associated with the approach currently proposed for the use of existing accommodation. In particular these concerns relate to:

- Transport implications of non-home based workers seeking to take up accommodation within a sixty minute drive time that extends as far as places such as Minehead, Highbridge and Burnham and Weston-Super-Mare.
- Without active management, take up of visitor and private rented accommodation may exceed predictions resulting in displacement of visitors and more critically, low income households including young people dependent on low cost shared accommodation.

The Councils' key concern in relation to use by non-home based workers of existing accommodation is management of take up. It is understandable to assume that market forces will ensure that workers do not take up higher cost visitor accommodation during peak visitor periods for example. However, what is not considered are the implications of take up of private rented accommodation by workers with a higher than average income.

The Councils anticipate that growth in demand for private rented accommodation will result in an increase in the cost of local rents. Whilst this may have benefits in terms of stimulating investment in the areas around Sedgemoor and West Somerset in particular, it can also have adverse affects on communities where low cost affordable housing is already in short supply.

Planning Policy Statement 3 states that the:

'...key housing policy goal is to ensure that everyone has the opportunity of living in a decent home, which they can afford, in a community where they want to live.'

It is essential that EDFE recognises that unprecedented take up of existing accommodation could place objectives for creating sustainable mixed urban and rural communities, where everyone has access to affordable housing, at risk.

The Councils' advice in this context is for EDFE to commitfully to proactive management of accommodation supply and demand by workers. This should, for example, make provisions for:

- Encouraging workers to take up available accommodation in suitable locations including Bridgwater, Cannington, Williton, Stogursey and Watchet, with access to Hinkley bus services within walking distance.
- Enabling placement of individuals who travel to the area in search of employment, but not formally engaged by EDFE or an associated contractor, in accommodation.

- Ensure access to accommodation for workers that may be between contracts and therefore possibly not entitled to stay on the campus sites.
- Phasing the delivery of the temporary campus accommodation such that a minimum level of provision is made available to meeting demand and that completion to the full scale (which should still, in the view of the Councils be reduced in scale on the two larger sites) will only take place in response to evidence of need. The approach will only be effective where use of existing accommodation supplies is supplemented by investment in local empty properties and in permanent new build accommodation.
- Comprehensive monitoring of construction workers accommodation needs and take up, working closely with the District housing teams, to provide support services, benefits advice, emergency accommodation etc, to avoid impacts in the local communities.

6.4 Purpose-built Accommodation

The Councils continue to object to the proposed scale of the temporary campus accommodation proposals. The reasons for concern relate to:

- concentration of a significant volume of predominantly male workers on large single sites could potentially have severe social and environmental impacts on already vulnerable areas, namely a deprived part of Bridgwater and on small scale rural communities at Shurton, Burton and the wider Stogursey Parish which the Council and the Community see both as an individual issue and in cumulative terms;
- Noise and light disturbance (without data to enable the Councils to take a view on potential impacts);
- Anti-social behaviour associated with workers when off duty but also with the potential for the campus sites to attract unwanted activity including protests and trespassing;
- Visual impact of large scale temporary accommodation buildings impacting on property prices, perception of local areas and disturbance of neighbouring residents. In particular the implications of the campus facility at Innovia impacting directly on key gateway routes into Bridgwater directly impacting on the objectives of Bridgwater Vision and potentially undermining the deliverability and occupation of completed housing on the northern part of the site;
- Community cohesion and the risk of creating divide between local residents and the workforce that could be more effectively managed or avoided where the campus sites were at a reduced scale; and
- **Because there are better solutions available than building temporary build complexes for workers in single concentrated locations impacting on vulnerable communities.**

6.5 On-site Campus

6.5.1 Summary of key changes

Given the reduced resolution of masterplan images it is not entirely possible to be certain about the detail of changes between the Stage 2 proposals and what is presented now. The following changes are noted:

- The scale of the Campus has been reduced by 190 bedspaces;
- The overall footprint of the accommodation site has been reduced however it the accommodation and sports facility areas have now been replaced by a construction area;
- It is not clear what the difference in parking provision is in the new layout;
- The new linear buildings layout provides for a reduced amount of landscaping between the accommodation blocks reducing the potential to create quality accommodation for workers and increasing the starkness of the solution compared with the existing character and appearance of the area;
- Sports facilities are provided closer to the site entrance and public access is proposed; and
- Illustrations on pages 11 and 33 of the update document suggest differing boundary treatments. In reality, it is difficult to decipher whether an appropriate boundary treatment is provided on Wick Moor Drove.

6.5.2 Policy and Guidance

The Hinkley Point C Accommodation Campus site is greenfield land outside of any settlement. In principle therefore provision of accommodation on this site would not be acceptable to the local authority. Development of this scale, alongside the construction areas will cause direct harm to the character and environmental quality of the area as well as the residential amenity of the surrounding areas.

6.5.3 Councils' Response

Any campus accommodation in this location needs robust and extensive justification and should be provided at a scale that is based on an evidence of need that has not been presented in the Stage 2 update.

The Councils accept that some worker accommodation on site at Hinkley is likely to be necessary to provide accommodation for security personnel and also for management of night-time activities on site. In the absence of clarification from EDFE on what this minimum requirement is, the Councils have taken an assumption that accommodation for some 100 workers would be necessary.

6.5.4 Design and Environmental Factors

It is noted in EDFE's proposals that ground levels will be lowered to a maximum of 20m AOD and will be screened to the south by an embankment that will be built to reach 26m to reduce visibility. However, it is not at this stage clear whether this design solution has been informed by a landscape assessment, as

recommended to EDFE by CABE and the South West Design Review Panel in December 2010. Further to this, their advice in relation to pursuing a more creative approach, considering the legacy of the earthworks on this site has not been addressed.

A further aspect of the changes worth noting is the relocation of the sports facilities to a more accessible location for local communities. The Councils would urge EDFE to consider this apparent solution more carefully. It is unlikely that this solution alone would encourage use by local residents. In a recent community consultation event in the village of Stogursey, one resident noted her surprise that EDFE thought that she or her neighbours would wish to use the playing pitches provided.

In looking at this design solution again, it would perhaps be more appropriate to consider how any investment could also respond to local needs, for example in relation to making provisions for equestrian sports on and/or off site.

A key concern for the Councils is the impact of a worker campus of this scale on the local population. Accommodating up to 510 workers in a single rural location is likely to generate a number of problems which need to be properly explored and mitigated. These risks include:

- Extending the loss of existing rural environment further than would otherwise be necessary;
- Bringing the potential for protestor activity much closer to the villages of Shurton and Burton;
- Increasing the number of traffic movements between the campus and local villages and towns in the evenings. The main concern in relation to this is the possibility of risks associated with drink driving on a unlit and narrow route that will already be experiencing heavy traffic volumes; and
- Prolonged impact on local residents who will have to endure the lengthy construction phase and who have grave concerns about the temporary major expansion of their population without the opportunity to establish any lasting community legacy. It is a serious concern of the Council that this may have direct health impacts on residents in terms of stress related illnesses.

6.5.5 Legacy Use

The Councils' HPC Project SPD sets out a range of recommendations for legacy uses that EDFE is encouraged to properly consider including for including:

- Flexible use buildings that could be used by both EDFE and the local community for example an enhanced community hall/education centre. A suitable solution may be possible within the local village and should be explored with local residents;
- Investment in sports facilities should be maximised by providing facilities that would be suitable for local communities as well as workers and which could be retained and effectively maintained as permanent legacy, for example in Stogursey; and
- Finally, where temporary buildings are being used, the Councils would welcome EDFE considering how they might be reused for the benefit of local communities, provided solutions reflect needs and aspirations as suggested by

policy and local residents and are viable long term from a financial perspective.

6.6 Bridgwater A – the Former Innovia Site

6.6.1 Summary of key changes

Given the reduced resolution of masterplan images it is not entirely possible to be certain about the detail of changes between the Stage 2 proposals and what is presented now. The following changes are noted:

- The scale of the Campus has been reduced by 225 spaces (or 75 if the Rugby Club site is not developed);
- The overall footprint of the development has been reduced as shown on page 13 of the update document;
- It would appear that parking provision on the site will be retained although to a lesser, but unknown, extent;
- The number of sports areas has been reduced and relocated to the Bath Road boundary side of the site;
- The security perimeter appears to exclude the sports pitch areas and this is confirmed in supporting text;
- Public access to the sports pitches is proposed;
- There is less detailing provided in relation to boundary treatments on Bath road;
- Bus parking and turning areas have been reduced but it is not clear how this might be managed; and
- There appears to be less landscape planting proposed between the Innovia site and the Sydenham house boundary.

6.6.2 Policy and Guidance

The Bridgwater A, or Innovia, site currently benefits from outline planning permission for residential development as part of the large scale mixed use scheme development, which has now commenced.

Any development on this site should be mindful of facilitating the long term delivery of the extant consent and take account of Bridgwater Vision and the North East Bridgwater design principles, and the design code for the sites implementation.

Further to this, Sedgemoor District Council policies for protecting amenity and recreational space (H2) and community facilities (PC S7) continue to apply and are a consideration for EDFE in developing their proposals.

6.6.3 Councils' Response

The Councils maintain the position that in delivering any development at Bridgwater A, full regard should be had to the existing development context for this highly visible gateway location. The Councils would expect significantly

more information on the proposals at this location before being able to take a view on whether or not proposals will achieve standards expected of development in this area.

Changing the perception of the area through quality design is an aspiration promoted through the North East Bridgwater applications and design codes and now underpinned by the HPC Project SPD. The plans continue to fail to demonstrate that any objectives for North East Bridgwater can be achieved.

6.6.4 Design and Environmental Factors

The campus style approach is 'alien' to the urban form and is unlikely to achieve the levels of innovation expected by the authority in this important location. The grid road layout continues to lack finesse and the frontage treatment onto A39 Bath Road is non-existent and therefore likely to directly undermine the principles of Bridgwater Vision and the North East Bridgwater design principles.

The positioning of sports facilities outside of the campus perimeter is welcomed in principle by the Councils. However, moving the facilities to the A39 boundary alone is not an adequate response to facilitating better integration with local communities. The loss of the Bridgwater Sports and Social Club is against existing local policy and whilst the provision of the sports areas represents a replacement it is difficult to argue that this can be considered a like-for-like replacement and is not considered an improvement. The playing fields continue to be designed to meet the needs of the workforce alone. No clear strategy is presented to ensure that facilities would be suitable for both workers and local residents. This needs to be informed by direct engagement with existing users.

Sedgemoor District Council is particularly concerned about the lack of proposals for the undeveloped part of the site shown to the north and the reduced amount of landscaping. It is expected that the current proposals will do even less than previously to enhance the setting of Sydenham Manor. Further to this, the left over area of open space to the extreme south of the site and the predominance of parking onto the Bath Road frontage all need to be given further and proper consideration. This will be essential to ensure that effective landscape design solutions are developed now and lay appropriate foundations for the long term development of housing and open space on this site.

As raised with EDFE on an ongoing basis, a key concern for the Councils is the impact of a worker campus of this scale on the local resident population. Accommodating up to 1,000 workers in a single location is likely to generate a number of problems that need to be properly explored, assessed and mitigated. These risks include:

- Embedding and prolonging perceptions of North East Bridgwater as low value industrial/business area, directly contravening regeneration plans and ongoing investment;
- Concentration of anti-social behaviour associated with the campus, both from campus residents and from neighbouring areas;
- Increased traffic movement affecting road safety; and
- Creation of a poor quality built environment, prolonging the negative impact of having a derelict industrial legacy in the area when investment could

deliver high quality buildings and spaces that could instead make a positive contribution.

Further to the above issues and concerns, the Councils would also refer EDFE to environmental issues raised at Stage 2. It is of high importance to Sedgemoor District Council that adequate information is made available by the developer prior to submission of an application for accommodation on this site.

6.6.5 Legacy Use

In keeping with the principles described in the Councils' SPD and reflecting once again on the issues set out in the Councils' Stage 2 response in October 2010, the Councils would continue to expect EDFE to:

- Provide a link from the site across the railway in the form of a pedestrian bridge in support of the NE Bridgwater design principles;
- Ensure that proper integration of the rhyme network is developed in partnership with the Internal Drainage Board and the Environment Agency;
- Invest in permanent high quality frontage on Bath Road and on the railway boundary to create an appropriate statement in respect of quality permanent development;
- Establish a road layout that will be suitable for the longer term delivery of housing on this site. *This will need to be agreed with Sedgemoor District Council who will be the decision making authority for the reserved matters application for this site. To ensure certainty on the road layout solution, the Council is keen to work with EDFE and the current landowner to expedite the delivery of the reserved matters applications for permanent housing on this site.*
- Provide for delivery of some permanent build housing on the site that can be used by workers in the short term and converted to 1,2 and 3 bed accommodation in the longer term;
- Invest in recreation facilities that can be used by workers but that will also be suitable for use by local communities during and after the construction period. This will require EDFE to consider whether or not shared facilities will be appropriate, and/or if additional investment off site would be more appropriate;

In conclusion in relation to the Bridgwater A site, the Councils welcome demonstration that there is a willingness on the part of EDFE to be flexible in response to how the site is developed. However, a step change is required in order to establish any area of common ground with regard to how to deliver worker accommodation on this site. This would involve a much closer working relationship on a genuine masterplanning approach the site, including a mix of permanent and temporary housing, with associated leisure facilities, to meet the design objectives and to further reduce impacts and ensure investment contributes to the wider Bridgwater Vision objectives.

6.7 Bridgwater C – Rugby Club Training Pitch

6.7.1 Summary of key changes

Given the reduced resolution of masterplan images it is not entirely possible to be certain about the detail of changes between the Stage 2 proposals and what is presented now. The following changes are noted:

- Building plots have been reduced from eight to five;
- The overall footprint of the development remains the same and the boundary has been adjusted slightly;
- Vehicular has been adjusted to retain the existing car park access to and to the lower car park via College Way;
- It would appear that the amount of parking provision on the site has increased;
- There is an increase in the amount of open space provision however there is limited detail on landscape solutions;
- The staggered building frontage onto College Way; and
- There is less detailing available in relation to boundary treatments.

6.7.2 Policy and Guidance

Sedgemoor District Council policies for protecting amenity and recreational space (H2) and community facilities (PC S7) apply to any proposed development on this site and must be a consideration for EDFE in developing their proposals. Any development on this site must be accompanied by proposals to replace lost recreation facilities.

Any development on this site should also take account of Bridgwater Vision and the North East Bridgwater design principles, in particular where this development is to be considered as a part of the wider campus site.

6.7.3 Councils' Response

As at Stage 2, the Councils support the principle of development of worker accommodation on the former Rugby Club site on the basis that a legacy use of the worker accommodation is provided for. From this perspective, as pointed out by EDFE, it will be necessary to secure a planning consent for the long term use of the site.

The authorities would welcome submission of this application ahead of submission of the DCO application in order to ensure that what is delivered in the short term will be fit for purpose in the longer term.

Further to this, given the possible risk that it will not be appropriate to deliver accommodation on this site due to load bearing capacity, the Councils would welcome EDFE confirmation that the student accommodation or alternative longer term legacy could be delivered on the adjoining Bridgwater A site, again subject the principle of securing planning consent for this development.

6.7.4 Design and Environmental Factors

As with Bridgwater A, without details on design solutions, it is particularly difficult for the Councils to have confidence that the design solution for the Bridgwater C site will be of an appropriate standard to compliment urban form and make a positive contribution to the aims and objective of Bridgwater Vision.

Currently the Bridgwater C proposal gives little indication of how the site, if developed for worker accommodation would integrate with Bridgwater College. In line with the Councils' draft SPD, EDFE would be expected to demonstrate evidence that a high quality built frontage is created that creates a gateway to the College and make explicit how connections between the sites can be achieved to establish the area as a focus of activity.

With respect to the design of permanent buildings and the layout of the site, the Councils are aware of and concur with the following comments by Bridgwater College:

- Careful consideration needs to be given to the movement of workers and students. Timing of bus movements, locations of stops and design of routes through the site could help to reduce congestion at peak times and excessive inter-mingling of groups that could be a cause for concern.
- Buildings at Bridgwater C should be of a durable design, that enable conversion to accommodation and/or teaching space.
- There is a concern about the lack of self-sufficiency of the Bridgwater C accommodation units, where basic kitchen provision should be provided for individual or small groups of bedrooms.

As a final note, whilst the scale of this site is considered to be more appropriate by the Councils, given the proximity to Bridgwater A and the intention to more fully integrate the two sites, concerns set out above in relation to community cohesion and impacts apply to the Bridgwater C site.

6.7.5 Legacy Use

In keeping with the principles described in the Councils' SPD and reflecting once again on the issues set out in the Councils' Stage 2 response in October 2010, the Councils would expect EDFE to:

- Optimise the use of the land between College Way and the A39 to create a high quality gateway structure on this key site;
- Create a legible route from the accommodation site to the College to encourage the long term integration of the two sites; and
- Set out how the site can incorporate signposting to the college through public realm and built environment solutions.

Further to this, the Councils would seek to ensure that EDFE's proposals for car parking are minimised as much as possible and effectively screened given their highly visible location adjacent to the Rugby Club pitch.

The District Council, as planning authority, would wish to be further consulted on the detailed plans for this site, with a view to refining the design, and to ensure full support can be given.

6.8 New Housing

In the published draft accommodation strategy and the update document, it is acknowledged that previous consultations raised the suggestion of the delivery of permanent housing instead of campus sites.

The Councils would wish to point out that recommendations made by them to date have been on the basis of delivering permanent build housing as part of a suite of accommodation solutions rather than to completely replace campus facilities. That remains the position to date with an emphasis on reducing the scale of both sites to the minimum requirement at Hinkley Point (a figure yet to be defined by EDFE and assumed by the Councils to be 100) and to a scale that enables the provision of permanent build housing and buildings to the frontage of the Innovia site and to reduce the reliance on private rented and visitor accommodation.

EDFE's response has been to state that to convert the campuses to housing is not possible due to densities required. This justification is considered insufficient as a reason for not providing any permanent build housing.

Whilst the Councils welcome the commitment in the draft strategy to explore options for working with developers and the Councils to facilitate housing development, this must be on the basis of achieving new build as part of a suite of accommodation solutions that allows for reduction of the campus sites. In this context, the Councils would refer EDFE and any other interested party to the principles set out for permanent accommodation in the draft Hinkley Point C Project Supplementary Planning Document.

6.9 Housing Fund

The Housing Fund proposals mooted by EDFE in the draft Strategy are in principle welcomed by the Councils. Caution is recommended however in relation to the assumption that £5million will be sufficient to address 'residual local accommodation impacts' over the period up to project completion, as the distribution of workers in terms of accommodation take up is unknown, and at present, unmanaged.

As part of ongoing discussions about impacts and monitoring frameworks and the Fund, the Councils will commit to reviewing the appropriate scale of a Housing Fund including, where appropriate, opportunities to offset the size of the Fund through front loaded investment in permanent housing solutions.

Further to EDFE's suggestions that the Fund may be used to: '*refurbish vacant or substandard properties, or provide loans to help local people get onto the housing ladder*', the Councils' other suggestions for the fund include for example:

- Housing construction skills training to supplement the labour market as existing skilled personnel are lost to delivery of the Hinkley project;
- Provision of low carbon solutions for local households including energy efficiency advice, insulation solutions and low carbon energy installations to off-set the carbon footprint of the temporary developments;

Complementary support via the Community Fund should be made available for:

- Investment in facilities for communities directly adjacent to the campus sites with contributions paid towards projects identified by the local communities;
- Health and well-being support for local residents living close to the accommodation campus sites; and
- Investment in visitor economy to support impacts on visitor facilities where tourists to the area are deterred by the project activity.

Note: Compensation for property devaluation adjacent to the campus sites should be considered as part of the overall property scheme.

It is important to note that the Housing Fund will be separate from requirements for Section 106 contributions which will be agreed with EDFE separately. The S106 contributions are intended to make acceptable the developments which would otherwise be unacceptable in planning terms.

Contributions within the S106 will be required including for example: costs to the authorities for monitoring and enforcement officers; landlord accreditation schemes; costs to Councils services in terms of dealing with customer complaints and enquiries, in particular where these are not picked up by EDFE's accommodation office; costs for delivering Council housing services including managing housing options, HMO monitoring, and placing homeless households where increase in homelessness figures exceeds normal levels; costs for delivering domestic services including waste collection and disposal and gas safety; payments for community safety measures including community support officers; payment for enforcement officer time where unauthorised camping incidences arise; and investment in noise and lighting impact mitigation measures in households directly affected by the campus sites. These and other potential obligations are still being assessed by the Councils.

6.10 Accommodation Office

The Councils welcome the proposals for an accommodation office facility and would welcome discussions with EDFE to identify a suitable Bridgwater Town Centre site for such a facility as per previous comments.

An accessible location, for workers arriving by public transport as well as by car will be an important principle in influencing any decisions about an appropriate location for such facilities. It will also be appropriate to have this in a central town centre location highly accessible to local residents to encourage engagement and to ensure that it is clear how to make contact with EDFE in the event that any problems arise.

The concept of a HPC project 'One Stop Shop' contact point, with links to the Employment Brokerage initiative and other services that workers or prospective workers need to access is promoted. A facility of this type would also provide information for the local population. Proposals for the town centre HPC project 'One Stop Shop' will require further, urgent development to meet with EDFE's preliminary works timetable. At this stage the Councils do not rule out the possibility that a similar arrangement may be required in West Somerset, either in Stogursey Parish, in Minehead or in Williton. It may be that some form of contact point feeding into the main Bridgwater site is required to direct people.

The Councils very much see the importance of local knowledge and already well developed local relationships with existing providers when considering how to manage worker interaction with Tourist Accommodation. The opportunity to link with existing Visitor Information Centres, in terms of brokerage, such as the centre in Minehead and the Visitor Centre at the Hinkley Point C site should not be lost.

6.11 Draft Accommodation Strategy

The joint vision for accommodation provision agreed between EDFE and the Councils seeks to:

'Ensure Hinkley C provides housing solutions that enable workers and their families to integrate into the community and are economically active at a local level, whilst making a positive contribution to the Councils' Housing Strategies and their wider strategic planning objectives.'

There continues to be considerable scope for EDFE to align their Accommodation Strategy closer to this vision. Currently, by reducing the scale of the campus sites by 405 bedspaces and setting out assumptions on where non-campus based workers will stay across a 60 minute drive time area, the Strategy assumes a reasonable distribution of where workers will chose to stay whilst working at Hinkley based on best available data.

The Councils are concerned about a range of risks associated with the approach currently proposed in particular in relation to the following three key themes:

- Expectation that non-home based workers will seek to take up accommodation within a sixty minute drive time that extends as far as places such as Minehead, Highbridge and Burnham and Weston-Super-Mare, resulting in a masking or dispersal of potential local impacts;
- Without active management, take up of visitor and private rented accommodation may exceed expectations resulting in displacement of visitors and more critically, vulnerable households; and
- Maintaining large scale campus sites is in direct contravention of existing policy and guidance and without proper consideration of impacts, could have direct negative effects on surrounding communities.

6.11.1 Councils' Response

Overall, the Councils' have noted some material improvement in the accommodation proposals for the HPC Project. However it is reasonable to also note that changes do not adequately reflect the concerns raised at Stage 2. Whilst evidence of supply of non-campus accommodation has improved and a rationale for distribution presented, the Councils would encourage EDFE to take a significantly more pro-active response to accommodation provision and management and to seize the opportunity to further downsize the scale of temporary construction models.

Without carrying out a full assessment of national and local policy context, EDFE is at risk of overlooking established approaches to effective and sustainable development that is expected of all developers. Furthermore, the accommodation proposals as they are currently presented could undermine important regeneration

strategies and investment proposals when they could be making a positive contribution.

Both Councils are keen to see from EDFE a more holistic strategy that addresses more effectively the Housing (Accommodation) Dillington Accommodation Vision and responds to existing and emerging local and national policy. This will mean a stronger commitment to:

- providing more detailed design information and genuine work with the local planning authorities to bring forward schemes;
- responding to existing and emerging policy and guidance, including supporting ongoing investment in regeneration;
- pursuing opportunities for partnering with the authorities and developers to provide permanent accommodation in locations recommended in the draft Supplementary Planning Document (SPD) to enable downsizing and phasing of the temporary accommodation campus sites, providing more than one method of 'buffering' adverse impacts on local accommodation markets;
- proactive management and monitoring of accommodation take up by workers from the outset – including site preparation works - to ensure concentration of workers in locations with easy access to transport services to Hinkley and to avoid take up of disproportionate amounts of visitor and private rented accommodation;
- legacy benefits which provide confidence locally that communities of West Somerset and Sedgemoor will be compensated for the impacts that they will experience.

The Councils continue to be committed to working with EDFE on these issues towards agreement on a suitable approach before submission of EDFE's application for a Development Consent Order.

6.11.2 Legacy

EDFE's legacy commitments in the proposals as now updated still offer limited additionality in terms of legacy. The Councils are concerned that the Accommodation Strategy legacy benefits are limited to the possibility of stimulating improvements in accommodation facilities and site preparation works for a development that already has planning consent. What is missing from the Strategy is any concrete commitment to delivering permanent housing or community facilities as suggested in the Councils' Stage 2 response and as now set out in the Councils' draft Hinkley Supplementary Planning Document.

The draft Hinkley Point C Supplementary Planning Document describes a considerable number of tangible legacy opportunities that the Councils would encourage EDFE to give serious consideration including:

- reuse of high quality temporary accommodation structures in the local area for affordable housing provision;
- investment in permanent housing provision in Williton, Watchet, and Stogursey as well as in Bridgwater, in particular in the context of the Innovia site boundary treatment;

- delivery of sports and leisure facilities associated with accommodation proposals that can be retained in the long term for use by local communities; and
- development of ancillary use structures at Innovia to a permanent standard to enable their re-use for community facilities in the long term.

7 Community Proposals – Impacts and Benefits

7.1 Summary of Approach

The section of EDFE's Proposed Changes Consultation document on Community Proposals describes:

- The key areas of community impact and proposed benefit, relating to health and well being, transport, emergency services and security and environmental mitigation.
- A description of how a worker code of conduct will be established.
- Proposals for Community Engagement throughout the project.

7.2 Policy Guidance

The Councils' approach to planning obligations and community benefits is set out in detail in chapter 10 of the Draft Hinkley Point C Project SPD and for Sedgemoor is set out in policy MIP 3 of the Core Strategy submission draft.

Both Sedgemoor District Council's Corporate Strategy (2009-2014) and West Somerset Council's Corporate Plan (2010-2011) set a clear mandate to ensure adequate mitigation and compensation measures are put in place to limit the negative impacts of Hinkley Point C. Both documents also state that long term, local community benefit should be realised so as to deliver a lasting sustainable future for those communities hosting Hinkley Point C New Nuclear Build.

The Councils' objective is to ensure that the reasonable aspirations from within the community, the local authorities or other key stakeholders who have an interest in the Hinkley Point C project are reflected in legally enforceable measures to mitigate and compensate for the harms that would arise from the project. In accordance with the Planning Act 2008 and associated regulations and guidance, these measures and benefits would be delivered through planning permission, conditions and planning obligations and Development Consent requirements and planning obligations as appropriate. Outside of the planning process the Councils are also seeking a Community Benefits and Compensation scheme and also a Contractors Charitable Trust.

The Council's consider that IPC's guidance note 1 on Pre-Application Stages (March 2010²) is also of relevance for considering the level of detail that should

² IPC Guidance Note 1 on Pre-Application Stages (Chapter 2 of the Planning Act 2008), Revision 1, 29 March 2010.

be provided by a promoter to identify and mitigate any potential impacts on local communities. This states:

'The overriding intention of the legislation is to ensure that detailed matters are consulted upon and solutions or mitigation negotiated with the local community, landowners, statutory consultees and local authorities before submission of the application for development consent to the IPC.' Paragraph 8.

Regulation 11 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2009 requires that pre-application consultation under section 42 of the Planning Act must also include consultation with the relevant consultation bodies on the preliminary environmental information. Regulation 9 requires that the promoter's SOCC must state whether the proposals fall within the scope of the Directive, and if they do, how the applicant intends to publicise and consult on the preliminary environmental information. The authorities consider that this preliminary environmental information should set out in detail how local communities will be affected by the project and bring forward solutions or mitigation measures to respond to the effects on local communities. The relevant sections of the EIA Regulations are set out at Chapter 2 (Adequacy of Consultation).

7.3 Councils' Response

7.3.1 No Reference to the Dillington Joint Vision Statement

Although EDFE provide a Vision Statement at pages 5 and 6 of their Consultation Document it makes no reference to nor does it reproduce the objectives and priorities of the Dillington Visions. The Councils consider that EDFE's vision statement falls short in addressing many of the Council's corporate objectives and priorities that are captured in the jointly agreed Dillington Vision, relating to Economic Development; Developing a Low Carbon Future; Education, Employment and Skills; Housing (Accommodation); and Community Wellbeing.

The Councils strongly believe that the HPC project development should act as a driver for the achievement of a more dynamic, entrepreneurial, inclusive and sustainable economy in Somerset and the wider region and that EDFE should embrace the following objectives for the project

- accelerating the move to a high value, knowledge based economy, including the growth of an emerging energy, environment and related technology business cluster;
- supporting a growing, highly skilled workforce which can underpin a more competitive and productive business base;
- providing opportunities and benefits for all communities, helping to narrow inequalities and target deprivation and worklessness;
- recognising the value of the natural environment and maintain the County's positive image as a visitor and investment destination.

The Council's do not believe that these objectives are reflected sufficiently or appropriately within EDFE's Proposed Changes proposals.

7.3.2 Health and Well Being

Further assessment work and discussions with stakeholders, such as the Primary Care Trust (PCT) are needed to identify an appropriate figure to compensate and mitigate for the potential health impacts of the project. Discussions are continuing with EDFE and other relevant bodies to agree the figure that will ultimately be contained within the s.106 agreement associated with a Development Consent Order.

The Councils are disappointed that this section of the document is concerned only with contributions proposed to support local GP services. As set out in the draft HPC Project SPD (section 10) the Councils will also require contributions that allows for a holistic approach to community health and well-being, including preventative and responsive measures to improve the environment, provide opportunities for a healthy lifestyle and support delivery of high quality health care provision.

7.3.3 Transport

The Councils are concerned that there would appear to be a lot more work to be undertaken to understand the transport related impacts of the HPC project and to identify the transport improvements that will need to be put into place. It is currently unclear from the information provided as part of Proposed Changes or stage 2, whether the transport proposals would be sufficient to deal with the peak level of activity for the HPC project. Further information and findings from the transport assessment are required from EDFE, prior to submission of the DCO application in order that the effectiveness and appropriateness of the transport measures proposed can be assessed by the Councils. Further details of the Councils concerns relating to Transport are set out at section 9 of this report.

7.3.4 Emergency Services and Security

The Councils are encouraged that EDFE is working closely with the Councils and the emergency services to develop plans for community safety and support to the emergency services. The Councils consider that it is necessary for EDFE to commit to ensuring that there is adequate emergency service resources and resilience to cover the potential for increased incidents at the Hinkley Point site, on the transport network, and in the towns and villages hosting construction workers.

7.3.5 Environmental Mitigation and Local Mitigation

The Councils consider that the information provided as part of the Stage 2 consultation and more recently as part of the Proposed Changes consultation is not sufficient to understand the potential impacts on local communities or the environment and fails to set out the process for discussing and negotiating solutions or mitigation measures with the local authorities, local community and other key stakeholders.

The Councils are concerned with the statement within the consultation document that reads that '*details of local environmental mitigation will be finalised once our Environmental Impact Assessment is complete.*' The Councils believe that details associated with the environmental effects of the project (including the Proposed

Changes) and the measure required to mitigate or compensate for impact or harm should be presented and tested as part of the consultation process. The Councils believe that it is important that these details are discussed and negotiated with the local communities, the local authorities and other key stakeholders prior to submission of an application for development consent.

The Councils believe that the approach taken by EDFE with regard to consultation on environmental information and proposed mitigation does not accord with IPC guidance (Guidance Note 2 – para 8) and does not address the requirements of the EIA Regulations 2009 for consultation on preliminary environmental information. Our concerns on these matter are set out in detail in chapter 2 (Adequacy of Consultation).

During discussions with EDFE, the Councils have requested on a number of occasions that an assessment is undertaken of the combined effects (such as noise, traffic, visual impacts in combination) on the quality of life of local residents and on community well-being, and that this should be illustrated in a spatial manner. EDFE are urged to agree an approach to presenting impacts in a holistic manner that will be more accessible and easily understood by local communities and provide a sound basis for ongoing negotiations.

7.3.6 Local Mitigation

Given the absence of preliminary environmental information and details on mitigation solutions as part of the Proposed Changes material, in combination with major deficiencies in the environmental information provided as part of Stage 2 consultation, it is not possible for the Councils to assess the effectiveness of the local mitigation scheme proposed at page 16 of the consultation document. In accordance with the approach set out in the Council's HPC project SPD, the Councils' Corporate policies, and Sedgemoor's emerging Core Strategy policy MIP 3; measures, projects and services to enhance the medium and long term well-being and sustainability of the communities affected by the project, including (but not exclusive to) Shurton, Burton, Stogursey, Cannington, Comwich, Holford, Kilve, Nether Stowey, Bridgwater and, Williton and other affected communities, will be required.

7.3.7 Community Fund

The Councils are encouraged that the Community Fund has been increased to £20 million. Nevertheless, given the absence of supporting information it is not possible for the Councils to fully determine whether this fund is sufficient to compensate for the harm of the project. In accordance with the approach set out in the Council's HPC project SPD, the Council's Corporate policies, and within Sedgemoor's emerging Core Strategy policy MIP 3; EDFE should engage effectively with local communities and the Councils (at the pre-application stage) to identify appropriate compensation and mitigation, including the establishment of a community impacts mitigation fund to mitigate and compensate for the harm of the project across both Districts.

Given the multi-generational impacts of the project, the sheer scale of the construction project and the scale of potential profit from the operation of the power station should it receive DCO approval, the figure of £20 million is not considered to be commensurate or acceptable to the Councils or the Community.

7.3.8 Missing Elements of Impact and Benefit

The Councils remind EDFE of the need to ensure that a comprehensive set of economic, community/social, environmental and safety measures should be brought forward and agreed with the Councils to fully mitigate and compensate for the new and increased levels of impact and harm associated with the HPC project. The Councils reiterate that in order for the development to be in accordance with policy objectives, long term sustainable benefit should be realised for those communities affected by the negative impacts from Hinkley Point C and acting as host for a Nationally Significant Infrastructure Project and long term location for nuclear waste storage.

The principal topics and themes for the measures/initiative/projects are set out within section 10 of the Councils' HPC Project SPD. Additional areas to those set out within EDFE's Stage 2 document, that will need to be incorporated within obligations and requirements for a Development Consent Order, include:

- Measures for carbon emission minimisation and to enable local climate change adaptation.
- Protection of sites of international, national and local importance for landscape, ecology, geology, archaeology and built heritage, together with a range of compensatory measures that offset and compensate for the residual landscape and environmental harm resulting from the project, including contributions to green infrastructure priorities. These should be consistent with relevant national and development plan policy.
- Identification of appropriate means for reducing, reusing, recycling or disposing of waste materials, including transportation of waste arising from construction activity where required.
- Measures and/or contributions to address any negative impacts on Bridgwater as a place to live, work and learn including public realm and town centre improvements and contributions to meeting strategic regeneration objectives.
- Contributions towards cultural, leisure, recreation and religious facilities, services and facilities to meet project and local needs and promote social cohesion of affected nearby settlements, and where agreed, direct delivery.
- Specific measures to avoid crime and disorder, including distractionary activities, and contributions to the CCTV network.
- An employment and skills charter setting out investment in educational facilities, an employment brokerage, outreach initiatives, including community development and third sector support, which would raise aspirations and improve the employment prospects of local people in Sedgemoor and West Somerset.
- Provision of and contributions toward housing to compensate for the impact on the affordable and rented housing stock and adverse impacts on the housing market.
- Provision of and funding for facilities for visitors and tourists to effectively manage visitors during the construction and operation of Hinkley C and to compensate for the adverse effects on tourism.
- Service level agreements to resource the Councils' involvement in the management and implementation of mitigation, for example through economic

development, environment and community services, the monitoring of project impacts and enforcement.

7.3.9 Worker Code of Conduct

The Councils are encouraged that a worker code of conduct is to be established but further details are required on how the code will operate with further information provided and commitment from EDFE on:

- How the measure proposed will be legally enforced through provisions within contracts with contractors and through planning obligations;
- How the success or possible failure of the Code will be monitored and what penalties will be in place to compensate local communities when workers do not follow the codes.
- How the code will be agreed with the Councils and the emergency services and how it will align with the roles and responsibilities of these bodies with respect to community safety, policing and general community well-being.

7.3.10 Community Engagement

The Councils support the positive statement within the document that confirm that the EDFE “communication teams in Bridgwater will engage with the local community throughout the project, and will be available for the community to contact should they have any questions in relation to the project”. Nevertheless the Council have a number of concerns with the community engagement undertaken by EDFE to date. A significant shift in approach and methods of engagement will be required to ensure that future engagement initiatives are more responsive and sensitive to local community issues.

The Councils have a major concern that there has been only a partial response provided to local communities to the concerns they raised at Stage 2 and EDFE have not come forward with the full range of measures and initiatives to address stage 2 community issues. The Councils understand that the response to Stage 2 will be set out within the Consultation Report to be submitted with a development consent application and the Councils are concerned that this will not provide sufficient opportunity to engage with local communities on the detailed solutions and mitigation measures proposed to address their concerns, as advised by the IPC (Guidance Note 2).

The Councils also believe it is essential that communities and key stakeholders are engaged on the design, development and delivery of infrastructure, facilities, services and/or partnerships required to mitigate and compensate for the impacts of the project.

8 Construction Working Hours

8.1 Amendments to Shift Working

We note that one of the major changes introduced through the Proposed Changes consultation is in terms of the proposed amendments to shift working hours. Our observations and comments in regards to this are included below.

8.1.1 Summary of Key Changes

Primary changes in working hours are identified in the Consultation document on Update on and Proposed Changes to 'Preferred Proposals' (February 2011) as relating to the following:

- adoption of double shift working within the first year of securing consent;
- changes in shift patterns to facilitate a more gradual arrival and departure of workers; and
- acknowledgement of the likely necessity for night shifts.

We also note discussion provided on Page 18 of the consultation document, which reinforces and strengthens EDFE's need for overnight shifts. In addition to discussion at Stage 2, which focused on the need for overnight shifts during key stages of construction using concrete and towards the end of construction, discussion of overnight shifts provided in the current consultation document is identified as necessary, for example 'to maintain the programme or prepare equipment and to make the site ready for the main morning shift'.

We are concerned that this provides an apparent open-ended opportunity for overnight shifts and that this needs to be accurately reflected within the assessments of impacts to transport, the environment and the human population. The Councils are therefore concerned that revised Preliminary Environmental Information has not been provided to identify the significant environmental impacts associated with this change in the assumption and to consult on any necessary solutions or mitigation measures required.

8.1.2 Policy and Guidance

Excerpts from county and local policy, strategies and guidance of particular relevance are:

West Somerset Local Plan (April 2006)

- Policy PC/1: Air Pollution. Developments that generate atmospheric emissions which would cause harm or offence to human health, senses or property will not be permitted and where such uses exist the local planning authority will not permit sensitive other uses within a reasonable distance of such uses.
- Policy PC/2: Noise Pollution. Proposals for developments involving potential noise nuisance to existing occupiers of land or buildings will only be permitted when measures to minimise the impact of noise likely to be generated are incorporated as part of the development.

Sedgemoor Core Strategy Submission (February 2011)

- D16 Pollution Impact of Development, Residential Amenity - Development proposals that would result in the loss of land of recreational and/or amenity value or unacceptably impact upon the residential amenity of occupants of nearby dwellings and any potential future occupants will not be supported.

In terms of local policy or guidance relating to shift patterns, the primary policy reference relates to Comwich, for which Box 31 of the Draft HPC Project SPD states the following:

- Ship/barge movements, unloading operations and associated land vehicle movements should be restricted to between 07:30 – 19:30 on weekdays and 07:30 – 13:00 on Saturdays, with no operations on Sundays and Bank Holidays, to protect residential amenity.

Beyond this explicit reference, policy concerns relating to working hours and shift patterns are related to the indirect effects on working hours and shift patterns, for example, in terms of the air quality and noise effects of traffic generated by construction traffic, the air quality, noise and lighting effects caused by the need for additional night-time on-site activities, and the effects on local people and amenity as a result of these changes.

8.1.3 Councils' Response

Construction working hours is an issue of significant concern to the Councils and local communities and has the potential to result in a number of effects in terms of disturbance and possible nuisance. The Councils are aware of the programme issues that have affected development at Flammanville and that such delays could result in the need for increased resourcing of construction at HPC. While acknowledging the increased level of detail with regards to shift patterns, the Councils remain unsatisfied as there is insufficient information to provide a full and transparent understanding of the implications of the proposals. In particular, the effects which shift patterns, working patterns and arrivals and departures will have on traffic levels, together with air quality, noise and disturbance, need to be understood and if necessary appropriate mitigation and compensation measures will need to be discussed and agreed with the local communities and the Councils.

8.1.3.1 Effects of Changes in Shift Patterns on Traffic

Changes in shift hours will affect the traffic levels. As discussed elsewhere in this document, there is no evidence base provided which supports the transport proposals, and in this regard the effects of shift patterns on traffic flows and congestion. If changes in shift patterns were to facilitate a more gradual arrival and departure of workers to and from the main site, as anticipated on Page 17, it may be expected that traffic levels would be more dispersed throughout the day. However, information presented in relation to the Proposed Changes is currently insufficient to allow an informed understanding on the changes in traffic patterns expected.

We are further concerned with the lack of understanding regarding the effect of changes in shift patterns relating to vehicle movements and the resultant effects on noise and air quality at and surrounding associated development sites, in particular the Park & Ride and freight management sites. With shifts ending between 10pm and midnight, vehicle movements to, from and within Park & Ride sites may be expected for a period of an hour or more beyond midnight. Similarly, to allow movement of workers to the site for the 6 am shift, vehicle movements to the park and ride sites may be envisaged for around an hour or more prior to this.

8.1.3.2 Effects of Changes on Air Quality and Noise

As discussed above, owing to the absence of details on the implications of changes of shift patterns to traffic and flows, resultant effects on air quality and noise remain to be understood.

While changes in traffic flows and extension of shift starting times, finishing times, and handover periods may allow peak air quality and noise impacts to change from those anticipated by the Stage 2 Consultation Environmental Appraisal, long term average levels would not be expected to significantly differ due to similar or possibly increased levels of traffic. The implications in terms of vehicular air quality and noise effects of the proposed modified shift patterns remains to be either understood or qualified.

Furthermore, cessation of working of a second shift at midnight, rather than 11 pm as previously anticipated, on air quality and noise effects needs to be provided.

8.1.3.3 Effects of Changes on the Human Environment

The effects of the Proposed Changes in working hours and shift patterns have the greatest potential impact in terms of disturbance to local people and in terms of loss of local amenity. At weekends, the result of two contractor shift patterns could be that construction could continue with weekday shift patterns, with work only ceasing every other weekend at 3pm on Saturdays and on Sunday. While the effects of the Proposed Changes remain to be properly understood or qualified by the consultation material, the Councils are concerned about changes that would result in extended hours over which construction noise, air quality and light pollution would occur.

When considered in combination with the potential for overnight shifts, the construction project will effectively be a 24/7 operation, having a profound and unacceptable effect on the local community.

Overall, the proposals are considered to represent a fundamental shift in the living environment, from a rural setting towards that of an urban / industrial environment and cannot be supported.

9 Transport Proposals

9.1 Overarching Transport Strategy

The overarching transport strategy has not changed from the Stage 2 consultation. It can be summarised as:

- Provision of bus services from four Park & Ride sites and from Bridgwater accommodation campuses to minimise use of private cars by construction workers travelling to the HPC main site.
- Road-based freight management facilities at M5 Junctions 23 and 24.
- Transport of bulk materials to the site by water to a temporary jetty at the main site and Combwich Wharf, where a laydown area is provided.

- Construction of a western bypass to Cannington to reduce the number of vehicles travelling through the village.

There continues to be a fundamental lack of an evidence base and assessment to justify the transport strategy, both in terms of: the location and size of the Park & Ride sites; and the transport mitigation proposals, such as highway improvements that would be required. This is a major concern to the Councils at this late stage in the pre-application process and a cause of great anxiety to local communities who have reasonable concerns about highway safety, congestion and impacts on residential amenity.

9.1.1 Summary of Key Changes

Key changes to the transport proposals are as follows:

- Updates and Proposed Changes to the Park & Ride, freight management, Combswich Wharf and Cannington bypass proposals, that are dealt with in separate sections of the response below.
- Proposals to improve the local road network and enhance road safety, although there is no evidence base to demonstrate that these would be successful in reducing congestion or mitigating environmental impacts.
- Changes to the operational hours of the park and ride sites to reflect the revised shift patterns, although it is noted that these changes are not specifically stated in the consultation document.

Figure 11 of the Proposed Changes consultation document gives an estimate of where the HPC construction workforce will live and is based on accommodation location assumptions that have not been agreed with the planning authorities.

9.1.2 Policy and Guidance

Excerpts from county and local policy, strategies and guidance of particular relevance are:

- Draft NPS EN-1 states that 'if a project is likely to have significant transport implications, the applicant's Environmental Statement should include a transport assessment using the NATA/WebTAG methodology stipulated in Department for Transport guidance, or any successor to such methodology' (para. 5.13.3).
- The Draft Somerset Future Transport Plan, Technical Note 4 states the County Council '...will require the developer of new nuclear power stations in Somerset to: minimise the volume of road traffic associated with the development of the new power station especially at peak hours' and '...provide sustainable transport solutions for access to the site that workers and visitors will be required to use...'
- Transport in Bridgwater: The Way Ahead advises that good transport links to, in and around Bridgwater are fundamental to its economic and social vitality, but that, congestion and its associated knock-on effects have been a concern for a number of years. A series of highways, public transport and cycling schemes are set out in the document.

- The Connect 3 Study is concerned with the interrelationship between transport movements in the Bridgwater/Taunton/Wellington and A358 corridors, and those on the national and inter-urban networks. The initial option assessment report indicates that a core strategy will emerge based on reducing the need to travel and promoting use of sustainable modes within the Bridgwater, Taunton and Wellington, combined with improving the attractiveness of the A38 transport corridor for all modes. The core strategy would be supported by making better use of the existing road network through a combination of traffic management and improved information and awareness. Major new infrastructure schemes are proposed where they support the core strategy by releasing land and/or addressing specific congestion issues in town centres, thus assisting regeneration and promoting an enhanced urban environment. Options assessed through the Connect 3 study include:
 - A38 corridor package;
 - A358 package; and
 - Rail infrastructure and service improvements.
- The West Somerset Economic Development and Access Strategy sets out a number of general recommendations in relation to the objective to 'upgrade and improve the transport system in parallel with the economic development strategy.' These include advice that: highway improvements should consist of smaller safety schemes such as junction improvements and overtaking lanes; any bypasses should be reassessed in the longer term; and any major investment schemes should focus on addressing the transport problems in Taunton and Bridgwater. Specific recommendations relating to the A39 between Bridgwater and Williton include: an overtaking land southbound north of Holford; and layby and picnic areas in the short to medium term.
- Sedgemoor Core Strategy (Submission Version) Policy D10 states that development proposals should not compromise the safety and/or function of the local or strategic road networks in terms of both volume and type of traffic generated; and they should comprehensively address the transport impact of development and appropriately contribute to the delivery of the necessary transport infrastructure.
- The Access and Movement strategy in the Bridgwater Vision provides a vision for Bridgwater's transport network over the next 50 years. The strategy is based on the creation of a pedestrian focused Town Centre and a hierarchy of routes which provide easy and safe movement across the town providing opportunities for business and employment and allowing local people to reach public transport, shopping and local services. This also includes specific principles to transform the perception of the principal arterials into the town; creating urban boulevards, introducing priority public transport lanes, and dedicated pedestrian and cycle ways. The enhancement of pedestrian and cycle links between key destinations, public transport improvements including the creation of a key public transport corridor north-south through the town, the provision of Park and Ride sites to the north and south of the town and improvements to the rail station. These principles are presented in conjunction with the implementation of Travel Plans and incentives to encourage and reinforce sustainable travel behaviour.
- Draft HPC SPD – the sustainable transport plan in the draft SPD is consistent with the draft Somerset Future Transport Plan and seeks alignment between

the HPC project proposals and the long term plans and strategies of the county and district Councils.

9.1.3 Councils' Response

In comparison to the Stage 2 proposals the overarching transport strategy remains broadly unchanged, although there are site specific alterations as discussed in the sections below. There remains insufficient information to assess the transport impact of the proposals.

The stated aim of the HPC project transport strategy of reducing the volume of traffic associated with the development of the new power station at all times, particularly peak times, is in general accordance with the sustainable transport approach set out in the Draft Future Transport Plan and Draft HPC SPD. However, the aim should be to minimise the volume of traffic associated with development, not just reduce it.

As noted above, the general approach is broadly consistent with emerging policy and guidance, however the following deficiencies remain:

- The consultation document focuses on the situation of peak construction traffic during development. It does not address the situation in the first years of construction before mitigation measures are provided, or the operational phase post construction.
- A lack of evidence base to support the overarching transport strategy and transport proposals.
- A lack of proposals and details for sustainable transport schemes identified in relevant plans and strategies, such as junction improvements, bus priority, walking and cycling measures and related public realm improvements.
- A lack of information on control mechanisms to ensure the strategy is effective – e.g. monitoring, travel plans, incident management and enforcement measures.

With respect to the general lack of evidence base to support the overarching transport strategy, Somerset County Council and the district Councils have repeatedly requested further information. The following are the main technical matters which need to be resolved before the transport strategy can be assessed:

- Future year traffic models.
- Transport Assessment addressing the impacts of the transport strategy and the alternatives considered before arriving at the strategy.
- Bypass Report considering the assessment of options for the Cannington and Bridgwater Northern Bypasses in accordance with NATA.

9.1.4 Consistency with EDFE Supporting Information

There is little specific linkage between the Proposed Changes document and the supporting draft strategy documents. Nevertheless, the Councils believe there could be a conflict between the location of non home-based (NHB) worker as set out in the draft Accommodation Strategy and Figure 11 of the consultation document. The draft Accommodation Strategy locates NHB workers within

Somerset, and by implication within Sedgemoor, West Somerset and Taunton Deane. Figure 11 shows significant numbers of workers in North Somerset and Greater Bristol. The inconsistency may be a consequence of the workers shown in Figure 11 being home based workers, but this is not stated in the text supporting the figure.

Further observations are:

- The supporting documents do not provide a robust evidence base for the approach taken. For example, there are no traffic model outputs to support either the overall strategy or the individual schemes referred to as part of the Proposed Changes. There is also information missing from the draft Freight Strategy, such as a justification for material quantities, details on enforcement measures, information on incident management and details on monitoring measures.
- The approach taken for transport and the site proposals set out in the Proposed Changes document does not appear to be consistent with the draft supporting strategies (e.g. Accommodation Strategy). For instance there appears to be a conflict between the NHB worker Accommodation Strategy and the transport gravity model findings, but this cannot be confirmed through the information provided within any of the documents.
- The draft strategies do not describe in sufficient detail (providing the appropriate level of preliminary environmental information) the implications of the proposals on the local area.
- The draft strategies do not demonstrate how the proposals respond to the Council's policy objectives (demonstrating the sustainability credentials, the environmental implications and the approach to minimising impacts on local communities).

There is no overall transport strategy technical appraisal as part of the background papers and therefore it is not possible to comprehensively assess the impact of the Proposed Changes and their relationship or conformity with Council policies and strategies.

9.2 Cannington Park & Ride

9.2.1 Summary of Key Changes

Stage 2	Proposed Changes
Park & Ride located at land south of the village adjacent to the A39, providing: 368 car parking spaces 13 minibus spaces Motorcycle spaces Cycle racks Security and welfare building Roundabout junction to A39	Park & Ride located on same site, although layout has changed, providing: Reduction to 252 car parking spaces Assume continued provision of motorcycle spaces, cycle racks and security and welfare building Priority junction to A39 instead of roundabout.

9.2.2 Policy and Guidance

Excerpts from saved Local Plan and Core Strategy policies considered to be of particular relevance for this site are:

Sedgemoor Local Plan (September 2004)

- STR3 – The countryside will be protected for its own sake. Outside defined settlement boundaries, new house building and other new development will be strictly controlled.
- CNE4 – Areas of land which retain a largely rural character and appearance, and which have particular importance as Green Wedges, are defined on the proposals map. Positive land management which benefits the landscape, countryside access, amenity, nature conservation or urban area containment/enhancement functions of these areas will be encouraged and developments which would have a detrimental effect on these functions will not be permitted.
- HE4 – Proposals for development that would affect the settings of Conservation Areas should protect important views into or out of the area and significant boundaries, open spaces, trees and other landscape features are identified, retained or enhanced.
- CNE9 – Where a development would damage the nature conservation value of a site, such damage should be kept to a minimum and mitigation or compensation measures provided. Developers are encouraged to make positive provision for wildlife.
- CNE2- Development which adversely affects local landscape character or scenic quality will not be permitted. In particular, siting and landscaping should take account of visibility from publicly accessible vantage points.
- CNE15 – Development will not be permitted if it would increase the risk of flooding as a result of changes in surface water run-off or adversely affect water quality.

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- D9 Sustainable Transport and Movement – Travel management schemes and development proposals that reduce congestion and encourage and improved and integrated transport network and allow for a wide choice of modes of transport as a means of access to jobs, homes, services and facilities will be encouraged and supported. The Council will seek to ensure provision is made for inclusive, safe and convenient access for pedestrians, people with disabilities, cyclists and users of public transport that addresses the needs of all.
- S1 Spatial Strategy for Sedgemoor – Development will be concentrated at those places which offer the greatest opportunity for appropriate sustainable development. In rural areas these include Key Rural Settlements.
- P4 Key Rural Settlements (KRS) – Proposals for development in the KRS will be supported which are compatible with the scale and character of the community, enhance their role as service centres, support the needs of the local community, and encourage local job opportunities.
- P6 Development in the Countryside - Proposals for new development outside of identified settlements will be strictly controlled. Development will be

supported where it accords with other relevant policies contained in the Core Strategy that provide, exceptionally, for development in the countryside.

- D20 Green Infrastructure (GI) – GI will be safeguarded, maintained and enhanced as appropriate to form a multi-functional resource that provide an accessible network of green spaces. These should maintain or enhance landscape character, image, biodiversity and recreational value of an area.
- D14 Natural Landscape - Proposals should ensure that they enhance the landscape quality wherever possible or that there is no significant adverse impact on local landscape character, scenic quality and distinctive landscape features. All development proposals should contribute to enhancing and maintaining biodiversity, taking into account climate change and the need for habitats and species to adapt to it.
- D16 Pollution Impact of Development, Residential Amenity - Development proposals that would result in the loss of land of recreational and/or amenity value or unacceptably impact upon the residential amenity of occupants of nearby dwellings and any potential future occupants will not be supported.

9.2.3 Councils' Response

9.2.3.1 Principle of Development

It is the view of SDC that the proposed changes to the Cannington Park & Ride proposals represent improvements that address some previous comments. The reduction in the scale of the Park & Ride proposal by almost a third (in terms of car parking spaces) is welcomed as it would contribute to reducing landscape and environmental impacts subject to design issues discussed below.

SDC acknowledge that Park & Ride sites could form an important element of a transport strategy for the HPC project that accord with emerging Core Strategy policies MIP2 and D9, helping to reduce the number of vehicles travelling to Hinkley Point. Located at the junction of the A39 and C182, it is also apparent that in broad terms, Cannington is a reasonable location for a Park & Ride serving the surrounding rural area.

However, consistent with the Draft HPC SPD, the Council considers that for a temporary Park & Ride facility to be supported, it must form part of a well evidenced and robust transport strategy and investment package, the details of which have yet to be provided. This should seek to prevent where possible and otherwise minimise as far as possible adverse traffic impacts arising and contribute to the achievement of wider transport objectives in Cannington and along the A39 transport corridor.

There is also a lack of clarity on whether it is intended that the Park and Ride site would be used for visitors to the Hinkley PIC and, if so, where the visitors would park when the Park & Ride is removed. A travel plan for the visitor centre during construction and operation is required.

In addition to the amendments to the Park & Ride, the Proposed Changes document refers to traffic calming in Cannington. No detail is provided in relation to what these traffic calming measures would be and how they might contribute to improving the flow of traffic through Cannington (which would be of particular importance prior to the construction of a bypass), reducing

environmental impacts and improving safety. The Councils are aware that congestion and safety are major concerns for local residents and Bridgwater College, in particular at the preliminary works and main construction stages when the bypass would not be in place (as currently proposed). Priorities for intervention identified during consultation include:

- car parking for local residents, College students and visitors;
- pedestrian crossings; and
- landscaping and public realm enhancement along the High Street.

9.2.3.2 Design and Environmental Factors

With respect to the design of the proposed Park & Ride, it is considered that there have been a number of improvements that respond to comments made at Stage 2.

- The Park & Ride and access road has been moved further west within the site, potentially reducing the extent of noise and light pollution experienced by residents on Oaktree Way and Brownings Road in line with emerging Core Strategy policy D16.
- Provision of a priority junction onto the A39 in place of roundabout is supported on the basis that it could assist in maintaining the flow of traffic on this part of the A39.
- The facility has also been designed to fit within the boundary of an existing field, potentially helping to reduce the loss of hedgerows. This would assist in protecting biodiversity and the landscape setting and provide some screening, responding to Local Plan policies HE4 and CNE9, and emerging Core Strategy policies D14 and D16.
- Spoil storage has been redistributed to provide an embankment along the western side and northern tip of the site, which could assist in reducing disturbance to the Cannington Brook County Wildlife Site in line with Local Plan policy CNE9 and emerging Core Strategy policy D14.
- The Proposed Changes indicate additional hedgerow planting and more substantial planting along the field boundary with residential properties on Oaktree Way and Brownings Road. This could have benefits in terms of providing habitat for wildlife and protecting residential amenity (Local Plan policy CNE9 and emerging Core Strategy policies D14 and D16). For landscape planting to have immediate screening benefits, a commitment to the provision of semi-mature specimens will be sought.
- The retention of the flood alleviation channel and commitment to provide funding for the Environment Agency to deliver an enhanced flood alleviation scheme is welcomed and supported, as this responds to guidance in the Draft HPC SPD.
- It is also indicated in the Proposed Changes plan that a balancing pond would be provided. Subject to drainage requirements, this should be located to maximise long term ecological benefits and utility of the field at the legacy stage. In accordance with emerging Core Strategy policy D20 on Green Infrastructure, the Draft HPC SPD suggests that features such as spoil and balancing ponds could be used as part of a landscaping scheme that extends

the Cannington Green Wedge and along the Cannington Brook and promotes public access to local natural assets.

- The proposal to upgrade public rights of way in the vicinity of the site is welcomed as it will help to encourage walking and cycling in line with emerging Core Strategy policies D9 and D20. Where paths within the red lines are upgraded for use by cyclists, it will be important to ensure that permissions are extended into the village centre.

9.2.3.3 Legacy Use

With respect to the legacy of the site, the Proposed Changes advise that the Park & Ride facility would be removed after the construction of HPC and that the land would be restored to a greenfield site. As set out in the Councils' Stage 2 response and Draft HPC SPD, this approach is supported as the basic position, with only flood risk management and planting to be retained where appropriate.

Through the process of preparing the HPC SPD, the Council is currently exploring with the Parish Council and local residents whether alternative legacy uses would be appropriate in this location.

9.2.4 Consistency with EDFE Supporting Information

The Draft Overview of Associated Development Construction (Feb 2011) provides only brief details of construction sequencing.

9.3 M5 Junction 23 Park & Ride and Freight Management

9.3.1 Summary of Key Changes

Stage 2	Proposed Changes
<p>Park & Ride located on Greenfield site west of M5 adjacent to Dunball roundabout on A38, providing:</p> <ul style="list-style-type: none"> 756 car parking spaces 16 minibus spaces 20 bus parking spaces Bus shelters and bays Motorcycle spaces Cycle racks Security and welfare building <p>Freight Management Facility located on Greenfield site west of M5 adjacent to Dunball roundabout on A38, providing:</p> <ul style="list-style-type: none"> 75 HGV parking spaces Freight logistics building Security and welfare building 	<p>Park & Ride located on same site, although now swapped position with Freight Management Facility providing:</p> <ul style="list-style-type: none"> Increase to 1,300 car parking spaces Assume continued provision of motorcycle spaces, cycle racks and security and welfare building. Addition of Induction Centre building with 120 car parking spaces (not clear if these are additional to 1,300 spaces referred to above). <p>Freight Management Facility located on same site, although now swapped position with Park & Ride providing:</p> <ul style="list-style-type: none"> Increase to 85 HGV parking spaces No freight consolidation facility now proposed.

9.3.2 Policy and Guidance

Excerpts from saved Local Plan and Core Strategy policies considered to be of particular relevance for this site are:

Sedgemoor Local Plan (September 2004)

- STR3 – The countryside will be protected for its own sake. Outside defined settlement boundaries, new house building and other new development will be strictly controlled.
- E4 – Industrial, warehousing, office or other business uses will be permitted within defined settlement boundaries provided that: environmental impact is compatible with adjoining uses; and in the case of industrial or warehousing development there is safe access to the national or county road network.
- E6 – In the countryside beyond settlement boundaries the establishment of new employment sites and the extension of established sites will only be permitted where a countryside location is essential and no suitable alternative is available within or adjoining a local settlement.
- CNE2- Development which adversely affects local landscape character or scenic quality will not be permitted. In particular, siting and landscaping should take account of visibility from publicly accessible vantage points.
- CNE9 – Developers are encouraged to make positive provision for wildlife.
- CNE15 – Development will not be permitted if it would increase the risk of flooding as a result of changes in surface water run-off or adversely affect water quality.
- PCS8 – The extension of existing and the provision of new community facilities and education facilities will be encouraged. Exceptionally, where no site within a settlement can be found, a site may be permitted adjoining a settlement.

Sedgemoor Core Strategy Submission (February 2011)

- D9 Sustainable Transport and Movement – Travel management schemes and development proposals that reduce congestion and encourage and improved and integrated transport network and allow for a wide choice of modes of transport as a means of access to jobs, homes, services and facilities will be encouraged and supported. The Council will seek to ensure provision is made for inclusive, safe and convenient access for pedestrians, people with disabilities, cyclists and users of public transport that addresses the needs of all.
- P6 Development in the Countryside - Proposals for new development outside of identified settlements will be strictly controlled. Development will be supported where it accords with other relevant policies contained in the Core Strategy that provide, exceptionally, for development in the countryside.
- D1 Managing Flood Risk – All development proposals in Flood Zones 2 and 3 as defined by the Environment Agency's flood map will only be permitted where the Sequential Test is passed as outlined in PPS25.
- S1 Spatial Strategy for Sedgemoor - To create the most sustainable form of growth for Sedgemoor, Bridgwater will be the focus for the District's housing and employment growth. As the principal town in the District it will

accommodate the majority of new development within its urban area through the provision of a strategic urban extension, brownfield sites and at other well related Greenfield locations.

- D11 Economic Prosperity – All large-scale proposals (over 1,000m²) for research and development, light industrial and distribution should be focussed at Bridgwater, Burnham-on-Sea and Highbridge in accordance with the following locational priorities: firstly on brownfield sites; secondly on preferred greenfield sites set out in Policies P1 and P3; or thirdly, exceptionally, on other greenfield sites identified in the Employment Land Review. Exceptional circumstances include development that is of national or regional significance and has locational requirements that could not reasonably be accommodated on brownfield or the preferred greenfield locations.
- D20 Green Infrastructure (GI) – GI will be safeguarded, maintained and enhanced as appropriate to form a multi-functional resource that provide an accessible network of green spaces. These should maintain or enhance landscape character, image, biodiversity and recreational value of an area.
- D14 Natural Landscape - Proposals should ensure that they enhance the landscape quality wherever possible or that there is no significant adverse impact on local landscape character, scenic quality and distinctive landscape features. All development proposals should contribute to enhancing and maintaining biodiversity, taking into account climate change and the need for habitats and species to adapt to it.
- D16 Pollution Impact of Development, Residential Amenity - Development proposals that would result in the loss of land of recreational and/or amenity value or unacceptably impact upon the residential amenity of occupants of nearby dwellings and any potential future occupants will not be supported.
- D18 Education Provision – The Council will work with the County Council, Bridgwater College and other partners to provide, additional, extended or enhanced education facilities to address educational needs. Development proposals for education facilities will be supported where they are at suitable locations within Bridgwater, Burnham-on-Sea and Highbridge, Key Rural Settlements and Sustainable Settlements, are of high quality and sustainable design and are accessible by a range of sustainable transport modes.

Bridgwater, Taunton and Wellington Future Transport Strategy

This transport strategy identifies Park & Ride facilities at M5 Junctions 23 and 24 as potential elements of an A38 Public Transport Corridor. Recent analysis by Somerset County Council suggests that there may be no long-term requirement for a legacy public Park & Ride at this location. There is, however, considered to be a requirement for a “Park & Share” facility to relieve pressure on the highway from current informal parking that might be incorporated into the scheme from the outset.

Bridgwater Vision

Dunball features in the North Bridgwater and Bristol Road Character Area in the Bridgwater Vision, which is promoted as a Green Gateway Business Park:

‘North Bridgwater could become part of a green gateway to the town focused on high quality employment and office accommodation which could include a hub

managed facility for small and growing companies in knowledge based and environmental sectors benefitting from the riverside location, access to the M5 corridor and strategic gateway to Hinkley Point. Links could also be made with Bridgwater College in terms of training and employment opportunities.

Design principles set out in the Vision include:

- *New development will take the form of mainly high quality office development supported by small local centre uses.*
- *Dunball roundabout provides a key gateway into the town from junction 23 of the M5 motorway and potentially to Hinkley Point through a possible new link road. As such new development will need to reflect this role incorporating taller landmark buildings of significant architectural quality.*
- *The visitor's arrival into the area should be marked by strong arrival points and gateway features which could include a wind turbine with viewing platform creating inspiring views across the Levels and towards the coast. As well as providing renewable energy this could also be seen as a potential eco-tourist attraction.*
- *New office development along Bristol Road will need to contribute to a strong and coherent frontage with high architectural quality reflecting the areas role as a key approach into the town from the north.*
- *Bristol Road (A38) will provide a high profile gateway to the town through the creation of a tree-lined urban boulevard with formal tree planting, where possible, creative lighting, signage and public art.*
- *Bristol Road will also be part of the key public transport corridor providing high frequency bus connections to the town centre from a sequence of bus stops along the route. The road corridor will also incorporate segregated pedestrian and cycle lanes providing safe, high quality connections to the town centre.*
- *New development will also need to provide high quality active frontage to the River Parrett and incorporate a continuous foot and cycle path along the riverbanks to promote access to the town centre.'*

Sedgemoor Green Infrastructure (GI) Strategy

The route of the River Parrett is identified as a green lane in the GI Strategy, providing connections for pedestrians, cyclists and wildlife through Bridgwater and out towards Comwich to the northwest and Highbridge to the north. Provision of enhanced links through Bridgwater along the River Parrett are also identified in the Bridgwater Vision.

9.3.2.1 Principle of Development

It is the view of SDC that the proposed changes to the M5 Junction 23 proposals have been worsened through a substantial increase in the capacity of the facility with no detailed justification. The logic for the broad location of the proposed Park & Ride site and freight management facility is understood, but the proposal cannot be supported until a robust and detailed transport strategy is provided, along with a detailed Flood Risk Assessment. It is likely that there will be a need to contribute to the Parrett Barrier scheme but it is premature to provide advice on this, pending the technical work on flood risk. In the absence of information the

worst case scenario will be assumed. It is also notable that the Proposed Changes introduce a proposal for a sizeable induction and training centre on a temporary development site outside the Bridgwater settlement boundary.

Park & Ride and Freight Management Facility

SDC acknowledge that Park & Ride sites could form an important element of a transport strategy for the HPC project that accords with emerging Core Strategy policies MIP2 and D9, helping to reduce the number of vehicles travelling to Hinkley Point. The Council also considers that, although the site falls outside the Bridgwater settlement boundary, the proposed location for the temporary Park & Ride and freight management facility is logical given its proximity to J23 of the M5 and the absence of suitable alternative sites on the A38 corridor to the north of the town centre. Local Plan policy E6 advises that, in the countryside beyond settlement boundaries, the establishment of new employment sites will only be permitted where a countryside location is essential and no suitable alternative is available within or adjoining a local settlement. Similarly, emerging Core Strategy policy D11 allows for development on greenfield sites in exceptional circumstances, which includes development of national significance that could not reasonably be accommodated on brownfield sites or the preferred greenfield locations.

Notwithstanding the broad suitability of the proposed site, consistent with the Draft HPC SPD, the Council considers that for a temporary Park & Ride and freight management facility to be supported, it must form part of a well evidenced and robust transport strategy and investment package, the details of which have yet to be provided. This should seek to prevent where possible and otherwise minimise as far as possible adverse traffic impacts arising and contribute to the achievement of wider transport objectives in Bridgwater. In particular, the Proposed Changes do not make any reference to the potential incorporation of a public Park & Share facility, a proposal that was raised in the Councils' Stage 2 Response.

There is also a concern that the site at Dunball is located in Flood Zone 3a (High Probability) and that no PPS25 sequential test has been provided to demonstrate that there are no more suitable sites in Flood Zones 1 (Low Probability) or 2 (Medium Probability). This would need to be provided along with a detailed Flood Risk Assessment demonstrating there would be no increase to the risk of flooding in accordance with Local Plan policy CNE15 and emerging Core Strategy policy D1. Sequential tests should be undertaken with reference to all land uses proposed, including the induction and training centre.

Induction and Training Centre

The addition of an induction and training centre is viewed by the Council as a significant addition to the M5 Junction 23 proposals, where insufficient information has been provided on the facility to date to understand how it will function and to justify the location. Figure 17 in the Proposed Changes indicates a building with a large plan area and 120 associated parking spaces. The Councils appreciate that there could be a need for a HPC project induction point at an accessible location, such as M5 Junction 23, but with respect to the training element of the proposal, further information should be provided on day to day operation and the types of facilities and function of the centre.

The provision of a training facility is supported in principle, but there is a preference for a large facility of the type indicated to be provided as a refurbished or new permanent building closer to the town centre that would contribute to wider regeneration plans. Plan policy PCS8 states that the provision of new education facilities will be encouraged and that exceptionally, where no site within a settlement can be found, a site may be permitted adjoining a settlement. Emerging Core Strategy policy also expresses support for new education facilities, advising that these should be located at suitable locations within Bridgwater and other towns and villages.

Unlike the case of the Park & Ride and freight management facility, there will be a range of potentially suitable brownfield and preferred greenfield locations within the defined settlement boundary that should be considered as part of an options appraisal. Consideration should be given to the potential legacy use of the building, whether this would be used by EDFE or another organisation. The means of travel to the training centre would need to be considered as part of a robust and comprehensive travel strategy for the HPC project.

9.3.2.2 Design and Environmental Factors

With respect to the design of the proposed Park & Ride and freight management facility, it is considered that there have been some improvements that respond to previous comments:

- The overall scale of the proposals has increased significantly, however of the Park & Ride and freight management sites proposed, it is considered that the M5 Junction 23 site is best able to expand in capacity with relatively limited landscape and residential amenity impacts. Flood risk management, however, remains a significant and unresolved matter.
- The two car parks and freight management facility appear to have been sited on a north-south axis, adjacent to the existing industrial buildings and car parking. This helps to prevent incursion of development in a westerly direction towards the river and for this reason is considered an appropriate layout.
- Access proposals for the site have been adjusted to incorporate a turning onto the site that has a planning consent for the relocation of Bowerings Mill, an amendment that is supported.
- The Proposed Changes indicate more substantial landscape treatment along the southern boundary of the site, although further details will be required. This would assist in protecting biodiversity and the landscape setting and provide some screening from paths alongside the Parrett Trail, responding to Local Plan policies HE4 and CNE9, and emerging Core Strategy policies D14 and D16.
- It is noted that the site boundary has been changed to accommodate landscaping and drainage, which will be important elements of the final proposals.
- It is indicated in the Proposed Changes plan that a series of balancing ponds would be provided. Subject to drainage requirements, these should be located to maximise long term ecological benefits and utility of the fields at the legacy stage. In accordance with emerging Core Strategy policy D20 on Green Infrastructure and the Sedgemoor GI Strategy, the Draft HPC SPD suggests

that consideration should be given to existing and potential habitat and recreational assets of the River Parrett, its banks and fringes.

- The Draft HPC SPD highlights the opportunities for access to existing Public Rights of Way along the river to be improved, through provision of new connections through and/or along the boundary of the site. These should link to proposals in the Proposed Changes to 'enhance cycle facilities, particularly near the park and ride sites and accommodation campuses', and contribute towards the delivery of the River Parrett cycle and walking connections and A38 public realm enhancements referred to in the Bridgwater Vision.

9.3.2.3 Legacy Use

With respect to the legacy of the site, the Proposed Changes advise that some of the facilities could remain in place for future use subject to the appropriate planning permission or the land could be reinstated as a greenfield site. This approach corresponds in terms of basic principles with that set out in the Draft HPC SPD, which states that part or all or part the site could potentially be used for alternative development as a legacy, if approved during the construction stage of the HPC project:

- Retention of a Park & Share facility if through a trial this is shown to be required and viable in the long-term.
- Subject to further assessment by SCC, the trialling of a public Park & Ride site.
- Refurbishment of sites and buildings or new development, assessed with respect to the planning policy context at that time.
- Permanent legacy uses relating to the delivery of the low carbon cluster, with proposals being assessed with respect to the planning policy context at that time.

Retention of hardstandings and buildings on a speculative basis is not considered an acceptable legacy proposal. Therefore, if none of the four options set out above is considered acceptable then the site should be reinstated to greenfield land, with only flood risk management and planting to be retained where appropriate.

9.3.3 Consistency with EDFE Supporting Information

The Draft Overview of Associated Development Construction (Feb 2011) provides only brief details of construction sequencing.

9.4 M5 Junction 24 Park & Ride and Freight Management

9.4.1 Summary of Key Changes

Stage 2	Proposed Changes
Park & Ride located on Greenfield site on A38 close to Bridgwater Services and Stockmoor Village, providing:	Park & Ride located on same site, with some amendments to the site boundary for landscaping and drainage. The number of

<p>684 car parking spaces 14 minibus spaces 16 bus parking spaces Bus shelters and bays Motorcycle spaces Cycle racks Security and welfare building Freight Management Facility located on Greenfield site on A38 close to Bridgwater Services and Stockmoor Village, providing: 45 HGV parking spaces Security and welfare building</p>	<p>parking spaces remains as at Stage 2. Freight Management Facility located on same site, providing: Increase to 55 HGV parking spaces, from 45 spaces at Stage 2.</p>
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9.4.2 Policy and Guidance

Excerpts from saved Local Plan and Core Strategy policies considered to be of particular relevance for this site are:

Sedgemoor Local Plan (September 2004)

- STR3 – The countryside will be protected for its own sake. Outside defined settlement boundaries, new house building and other new development will be strictly controlled.
- CNE4 – Areas of land which retain a largely rural character and appearance, and which have particular importance as Green Wedges, are defined on the proposals map. Positive land management which benefits the landscape, countryside access, amenity, nature conservation or urban area containment/enhancement functions of these areas will be encouraged and developments which would have a detrimental effect on these functions will not be permitted.
- E4 – Industrial, warehousing, office or other business uses will be permitted within defined settlement boundaries provided that: environmental impact is compatible with adjoining uses; and in the case of industrial or warehousing development there is safe access to the national or county road network.
- E6 – In the countryside beyond settlement boundaries the establishment of new employment sites and the extension of established sites will only be permitted where a countryside location is essential and no suitable alternative is available within or adjoining a local settlement.
- CNE2- Development which adversely affects local landscape character or scenic quality will not be permitted. In particular, siting and landscaping should take account of visibility from publicly accessible vantage points.
- CNE9 – Developers are encouraged to make positive provision for wildlife.
- CNE15 – Development will not be permitted if it would increase the risk of flooding as a result of changes in surface water run-off or adversely affect water quality.

Sedgemoor Core Strategy Submission (February 2011)

- D9 Sustainable Transport and Movement – Travel management schemes and development proposals that reduce congestion and encourage and improved and integrated transport network and allow for a wide choice of modes of

transport as a means of access to jobs, homes, services and facilities will be encouraged and supported. The Council will seek to ensure provision is made for inclusive, safe and convenient access for pedestrians, people with disabilities, cyclists and users of public transport that addresses the needs of all.

- S1 Spatial Strategy for Sedgemoor - To create the most sustainable form of growth for Sedgemoor, Bridgwater will be the focus for the District's housing and employment growth. As the principal town in the District it will accommodate the majority of new development within its urban area through the provision of a strategic urban extension, brownfield sites and at other well related Greenfield locations.
- D11 Economic Prosperity – All large-scale proposals (over 1,000m²) for research and development, light industrial and distribution should be focussed at Bridgwater, Burnham-on-Sea and Highbridge in accordance with the following locational priorities: firstly on brownfield sites; secondly on preferred greenfield sites set out in Policies P1 and P3; or thirdly, exceptionally, on other greenfield sites identified in the Employment Land Review. Exceptional circumstances include development that is of national or regional significance and has locational requirements that could not reasonably be accommodated on brownfield or the preferred greenfield locations. The site at Huntworth (South Bridgwater) is specifically reserved for business uses that will support Hinkley C NNB. Part of site potentially required for park and ride facility. Access constraints to be fully resolved. Likely that part of site developed in short term with P & R site developed in the long term.
- D20 Green Infrastructure (GI) – GI will be safeguarded, maintained and enhanced as appropriate to form a multi-functional resource that provide an accessible network of green spaces. These should maintain or enhance landscape character, image, biodiversity and recreational value of an area.
- D14 Natural Landscape - Proposals should ensure that they enhance the landscape quality wherever possible or that there is no significant adverse impact on local landscape character, scenic quality and distinctive landscape features. All development proposals should contribute to enhancing and maintaining biodiversity, taking into account climate change and the need for habitats and species to adapt to it.
- D16 Pollution Impact of Development, Residential Amenity - Development proposals that would result in the loss of land of recreational and/or amenity value or unacceptably impact upon the residential amenity of occupants of nearby dwellings and any potential future occupants will not be supported.
- D18 Education Provision – The Council will work with the County Council, Bridgwater College and other partners to provide, additional, extended or enhanced education facilities to address educational needs. Development proposals for education facilities will be supported where they are at suitable locations within Bridgwater, Burnham-on-Sea and Highbridge, Key Rural Settlements and Sustainable Settlements, are of high quality and sustainable design and are accessible by a range of sustainable transport modes.

Bridgwater, Taunton and Wellington Future Transport Strategy

This transport strategy identifies Park & Ride facilities at M5 Junctions 23 and 24 as potential elements of an A38 Public Transport Corridor. However, recent

analysis by Somerset County Council suggests that there may be no long-term requirement for a legacy public Park & Ride at Junction 24.

Bridgwater Vision

Huntworth is promoted as an Enhanced Distribution Area in the Bridgwater Vision:

Huntworth would retain and enhance its role as a distribution area with the potential to attract uses of regional/national significance offering excellent links to the M5 motorway and low density, high quality flexible business space and facilities within a secure working environment.

Design principles set out in the Vision include:

- *Huntworth will retain and enhance its role as a distribution area with supporting local facilities for workers promoted in the area including a training centre (linked to the college skills academy for logistics), gym, restaurant and child care facilities.*
- *New development within the area will need to reflect the areas highly visible position along the M5 corridor through high profile, contemporary and highly sustainable (zero carbon) buildings.*
- *New development should provide frontage to the canal network and take the opportunity to enhance wildlife habitats and increase public use.*
- *A coordinated approach to signage, lighting and general public realm and landscape treatments will improve the environmental quality of the area.*
- *Arrival points into the area should be marked by strong gateway features which could include new landmark buildings/features and/or public art particularly at junction 24.*
- *Taunton Road will be promoted as a key public transport corridor with high frequency bus services giving workers in the area direct and frequent access to the town centre.*
- *A Park & Ride site adjacent to the A38 Taunton Road in conjunction with enhanced bus services will also provide connections to Bridgwater town centre.*
- *High quality, safe and legible pedestrian and cycle routes will be created through the area strengthening links back to the town centre particularly along the Canal corridor.*
- *A Travel Plan would be critical to the options presented for the site, with the potential for a bespoke public transport service and connecting pedestrian and cycle infrastructure back to the town centre.*

Sedgemoor Green Infrastructure (GI) Strategy

Land to the west of the proposed site is identified in the GI Strategy as Strategic Nature Area for woodland creation, as proposed in the South West Nature Map.

Emerging Bridgwater Gateway Design Principles

In order to respond to EDFE proposals at this site, and taking account of the strategic motorway junction location and low flood risk of the land, the emerging Core Strategy identifies the site as a potential location for business and general

industrial use, but with the land specifically reserved for employment uses that will support the HPC project. In accordance with the emerging Core Strategy position and to prevent ad hoc speculative development in this location, SDC are in the process of preparing a Bridgwater Gateway Design Principles document. This will be expected to inform any HPC project related development and guide legacy planning for this location.

9.4.2.1 Principle of Development

It is the view of SDC that the proposed changes to the M5 Junction 24 proposals remain materially unchanged, with the exception of some minor adjustments to layout and relatively small increase in freight holding capacity. The logic for the broad location of the proposed Park & Ride site and freight management facility is understood.

Reference is made in the Proposed Changes to the pending planning application for the site and it is encouraging that EDFE state that they would be willing to work with the applicant. This application will need to take account of drainage matters as well as provide a satisfactory transport solution at the A38 roundabout.

SDC acknowledge that Park & Ride sites could form an important element of a transport strategy for the HPC project that accords with emerging Core Strategy policies MIP2 and D9, helping to reduce the number of vehicles travelling to Hinkley Point. The Sedgemoor Local Plan designates the area as a Green Wedge (Policy CNE4) outside the settlement boundary (Policy STR3), an approach that aims to prevent the coalescence of North Petherton and Bridgwater. While SDC continues to recognise the amenity and landscape role of the Green Wedge, the Council also acknowledges that the proposed location for the temporary Park & Ride and freight management facility is logical given its proximity to J24 of the M5 and the absence of suitable alternative sites on the A38 corridor to the south of the town centre.

Local Plan policy E6 advises that, in the countryside beyond settlement boundaries, the establishment of new employment sites will only be permitted where a countryside location is essential and no suitable alternative is available within or adjoining a local settlement. The emerging Core Strategy identifies the site as a potential location for business and general industrial use, but with the land specifically reserved for employment uses in connection with the HPC project.

The Sedgemoor policy team will be evaluating the police case for the site through the consideration of the current application.

In this context, where there are tensions between retaining the land as Green Wedge and enabling economic development with the HPC project as a catalyst, it is considered particularly important that any development in the area should provide a high quality landscape and architectural design in this 'gateway' location that respects the semi-natural setting, protects residential amenity and contributes to SDC's corporate and economic development objectives. It is for this reason, and to prevent ad hoc development, that the Council has prepared the Bridgwater Gateway Design Principles.

9.4.2.2 Design and Environmental Factors

With respect to the design of the proposed Park & Ride and freight management facility, it is considered that there has been only one minor improvement. This involves the setting back of the boundary of the freight parking area slightly further from the distributor road. The overarching concerns raised at Stage 2, such as the expansive land take and inadequate landscaping and screening, therefore still apply.

The existing local policy framework, Bridgwater Vision, Sedgemoor Green Infrastructure Strategy and emerging Bridgwater Gateway Design Principles document all set out design objectives and cues that should inform the final proposal:

- The design should provide for buffers to nearby residential properties, so that residential amenity and outlook is protected in line with emerging Core Strategy policy D16.
- The layout should facilitate safe and attractive cycle and pedestrian links between North Petherton and Bridgwater, including connections to existing public rights of way and the proposed parkland at South Bridgwater Country Park and The Meads.
- The site will be prominent in views from the Quantocks towards Bridgwater. Tree planting around and within the site will assist in providing screening and could contribute to the delivery of new woodland consistent with emerging Core Strategy policy D20 and proposals in the GI Strategy.
- Proposals should contribute to enhancing public realm along the A38 and delivering a high quality public transport corridor in line with the Bridgwater Vision and Future Transport Strategy.

9.4.2.3 Legacy Use

With respect to the legacy of the site, the Proposed Changes advise that some of the facilities could remain in place for future use subject to the appropriate planning permission or the land could be reinstated as a greenfield site. This approach corresponds in terms of basic principles with that set out in the Draft HPC SPD, which states that part or all of the site could potentially be used for alternative development as a legacy, if approved during the construction stage of the HPC project:

- Subject to further assessment by SCC, the trialling of a public Park & Ride site.
- Refurbishment of sites and buildings or new development, assessed with respect to the planning policy context at that time.
- Permanent legacy uses relating to the delivery of the low carbon cluster, with proposals being assessed with respect to the planning policy context at that time.

Retention of hardstandings and buildings on a speculative basis are not considered an acceptable legacy proposal. Therefore, if none of the three options set out above is considered acceptable then the site should be reinstated to greenfield

land, with only flood risk management and planting to be retained where appropriate.

9.4.3 Consistency with EDFE Supporting Information

The Draft Overview of Associated Development Construction (Feb 2011) provides only brief details of construction sequencing.

9.5 Williton Park & Ride

9.5.1 Summary of Key Changes

Stage 2	Proposed Changes
Park & Ride located at land west of Mamsey Lane, providing: 316 car parking spaces 12 minibus spaces 10 bus parking spaces Bus shelters and bays Motorcycle spaces Cycle racks Security and welfare building	Park & Ride at Smithyard Terminal (existing Lorry Park), providing: 160 parking spaces Assume provision of motorcycle spaces, cycle racks and security and welfare building

From the Stage 2 proposals the proposed Williton Park & Ride site has been relocated from the greenfield site at Mamsey Lane to the Smithyard Terminal (known as the Lorry Park) site. The Smithyard Terminal lies to the west of Williton on the B3190 road to Watchet and approximately 0.7 miles to the north of the Washford Cross (A39) junction. The other key change to the proposal is a reduction in overall parking space numbers from 328 spaces (Stage 2) to a total of 160 spaces (Proposed Changes). Although the total construction work force numbers has increased, it is stated that those wanting to use the Williton Park & Ride site has decreased. It is assumed that a reduction of this magnitude results in the Smithyard Terminal site being now able to accommodate a park & ride. As previously EDFE had discounted the Smithyard due to the size of the site and its proximity to the A39.

9.5.2 Policy and Guidance

Excerpts from saved Local Plan and Core Strategy policies considered to be of particular relevance for this site are:

West Somerset Local Plan (April 2006)

- SP/5 Development Outside Defined Settlements – In the countryside outside of settlement development limits, development will only be permitted where it both benefits economic and social activity. Whilst also not leading to a significant increase in car travel and maintains or enhances environmental quality.
- T/3 Transport Requirements of New Development – New roads and improvement schemes should be designed to minimise their environmental impact.

- T/7 Non-Residential Development Car Parking – Car parking at non-residential development shall be provided on the basis that operational parking will be kept to the minimum necessary. It will also be reduced according to the availability of alternative forms of transport with contributions being sought for alternative modes where reduction in vehicle parking is appropriate.

9.5.3 Councils' Response

9.5.3.1 Principle of Development

In terms of change from Stage 2 to Proposed Changes, the proposed Williton Park & Ride has undergone the most significant change, primarily as the preferred location is on a completely different site. Although the site is well known to WSC, it is important to highlight that the same level of supporting information provided for all associated development sites at Stage 2 has not been provided for the Smithsyard Terminal site. The Council considers there is a distinct lack of supporting information for this site and linked to this adequate justification of the suitability of the site.

It is the view of WSC that the proposed reduction in car spaces is a positive step, subject to the provision of a full and robust transport strategy and investment package that justifies the approach taken. Both the Mamsey Lane and Smithsyard Terminal sites are considered to have merits and potential disadvantages, as described below.

A clear difference between the Mamsey Lane and Smithsyard Terminal sites relates to convenience of access from the A39, which is viewed primarily as an operational concern for EDFE, albeit one that originally resulted in the Smithsyard Terminal site being discounted. No explanation is provided in the Proposed Changes document about why this decision has been reversed.

From a planning policy perspective, there are two significant differences between the Mamsey Lane site and the Smithsyard Terminal. The first is that the preferred site is now a brownfield site. The re-use of brownfield land is considered in planning policy terms to be preferable to the use of greenfield land.

The second is the positioning of the site in relation to defined settlement boundaries. West Somerset Local Plan policy (SP/5) dictates that development outside of development limits will only be permitted where it both benefits economic or social activity, without leading to a significant increase in car travel. It further states that proposals should maintain or enhance environmental quality and accord with other Local Plan policies. The Smithsyard Terminal site falls outside of the existing development limits and, as a result, in planning policy terms there is a presumption against permitting such a development at the site. This presumption is dependant on the wider benefits, both economic and social, that the scheme would help facilitate.

Given the greater distance of the Smithsyard Terminal site from Williton or Watchet, when compared to the Mamsey Lane site at Williton, it is considered to deliver less tangible benefits in relative terms than the Mamsey Lane site could potentially achieve. It is acknowledged that the improvement of the Washford Cross junction, through the provision of a roundabout, is proposed as a community benefit in relation to use of the Smithsyard Terminal site. A common

public view is that the Washford junction is an accident black spot and improvements are required.

In comparison, siting the Park & Ride on the A39 at Williton would improve accessibility for users to visit shops and facilities in the village. As highlighted within the Councils Draft HPC SPD, the Mamsey Lane site could also align better with plans for a sustainable housing extension set out in the emerging Williton masterplan, with the potential to contribute towards the delivery of highways, flood risk management, utilities and community infrastructure requirements for the village. The Smithsyard Terminal site is incapable of delivering any of these long-term legacy benefits. This is further compounded by EDFE's legacy intentions for the site, which are simply to revert it back to a lorry park.

WSC's final view on which site would represent the preferred option would need to take account of the final accommodation strategy pursued by EDFE and how the needs of existing businesses on the site will be catered for. Provision of permanent housing at Williton, used as accommodation for construction workers during the HPC project construction phase, is promoted in the Draft HPC SPD. Should EDFE decide to bring forward accommodation proposals at Williton, the rationale for providing a Park & Ride facility on adjacent land may well be strengthened and the use of the Smithsyard Terminal would be the preferred solution and would be supported.

In addition, no details are currently provided as to how the Park & Ride proposals will fit around existing business uses on site. If the businesses would be displaced, EDFE will be required to set out what arrangements are being put in place to provide for relocation.

9.5.3.2 Design and Environmental Factors

With respect to the design of the proposed Park & Ride, it is clearly difficult to assess the proposals as a result of the limited extent of diagrams and details and absence of Preliminary Environmental Information. Despite these limitations, WSC wish to make the following comments:

- It is assumed that lighting and security provision would be commensurate with that set out in the Stage 2 Park & Ride proposals, but further information on these matters will be required.
- The Smithsyard Terminal site already benefits from semi-mature landscape planting, in the form of a tree screen around the boundary. Further details informed by a landscape and visual impact assessment will be required.
- Full consideration of the impact of the construction, operation and restoration of the Park & Ride at this location on adjacent and nearby properties at Five Bells would be required.

9.5.3.3 Legacy Use

The proposed legacy use for the Smithsyard Terminal site, after the construction of the HPC project, is to return the site to a lorry park. A related legacy of this associated development proposal would be any junction upgrades made at Washford Cross.

When compared to the more direct economic and social benefits that would result from the development of the alternative Mamsey Lane site as identified above, then the lasting potential legacy for the community is considered to be greatly reduced.

9.5.3.4 Consistency with Supporting Information

The Draft Overview of Associated Development Construction (Feb 2011) provides only brief details of construction sequencing.

9.6 Combwich Wharf

9.6.1 Summary of Key Changes

Stage 2	Proposed Changes
<p>Proposals comprise refurbishment of the wharf to provide an Abnormal Indivisible Load (AIL) berth and Lifting Birth for construction goods. And related development: AIL lay-by Bus parking Staff and visitor car parking Canteen/welfare building Office/welfare building Storage building 2 x fabrication buildings External storage compounds Security booth Waste disposal facility</p>	<p>Proposals for refurbishment of wharf remain as at Stage 2 No longer planning to have fabrication facilities or buildings for storage on-site No provision will be made for bus parking. There are fewer security, welfare and administrative buildings. Size of the proposed site has reduced from 13 to 10 hectares. New access road linking the Wharf to the laydown area will be created.</p>

9.6.2 Policy and Guidance

Excerpts from saved Local Plan and Core Strategy policies considered to be of particular relevance for this site are:

Sedgemoor Local Plan (September 2004)

- STR3 – The countryside will be protected for its own sake. Outside defined settlement boundaries, new house building and other new development will be strictly controlled.
- CNE9 – Where a development would damage the nature conservation value of a site, such damage should be kept to a minimum and mitigation or compensation measures provided. Developers are encouraged to make positive provision for wildlife.
- CNE2- Development which adversely affects local landscape character or scenic quality will not be permitted. In particular, siting and landscaping should take account of visibility from publicly accessible vantage points.
- CNE15 – Development will not be permitted if it would increase the risk of flooding as a result of changes in surface water run-off or adversely affect water quality.

Sedgemoor Core Strategy Submission (February 2011)

- D9 Sustainable Transport and Movement – Travel management schemes and development proposals that reduce congestion and encourage and improved and integrated transport network and allow for a wide choice of modes of transport as a means of access to jobs, homes, services and facilities will be encouraged and supported. The Council will seek to ensure provision is made for inclusive, safe and convenient access for pedestrians, people with disabilities, cyclists and users of public transport that addresses the needs of all.
- P6 Development in the Countryside - Proposals for new development outside of identified settlements will be strictly controlled. Development will be supported where it accords with other relevant policies contained in the Core Strategy that provide, exceptionally, for development in the countryside.
- D11 Economic Prosperity – All large-scale proposals (over 1,000m²) for research and development, light industrial and distribution should be focussed at Bridgwater, Burnham-on-Sea and Highbridge in accordance with the following locational priorities: firstly on brownfield sites; secondly on preferred greenfield sites set out in Policies P1 and P3; or thirdly, exceptionally, on other greenfield sites identified in the Employment Land Review. Exceptional circumstances include development that is of national or regional significance and has locational requirements that could not reasonably be accommodated on brownfield or the preferred greenfield locations.
- D20 Green Infrastructure (GI) – GI will be safeguarded, maintained and enhanced as appropriate to form a multi-functional resource that provide an accessible network of green spaces. These should maintain or enhance landscape character, image, biodiversity and recreational value of an area.
- D14 Natural Landscape - Proposals should ensure that they enhance the landscape quality wherever possible or that there is no significant adverse impact on local landscape character, scenic quality and distinctive landscape features. All development proposals should contribute to enhancing and maintaining biodiversity, taking into account climate change and the need for habitats and species to adapt to it.
- D16 Pollution Impact of Development, Residential Amenity - Development proposals that would result in the loss of land of recreational and/or amenity value or unacceptably impact upon the residential amenity of occupants of nearby dwellings and any potential future occupants will not be supported.

9.6.3 Councils' Response

9.6.3.1 Principle of Development

It is the view of SDC that the proposed changes to the Combrich proposals represent improvements that positively address some previous comments. Amendments to the proposals that are considered to alleviate some of the concerns of local residents and SDC are:

- The removal of proposals for fabrication facilities and buildings, which were considered an unacceptable intensification of activity in this rural location.

- Removal of storage buildings up to 12m high is supported, although it is noted that container-based storage over an area of several hectares would still have a substantial landscape impact on the rural setting.
- Removal of proposals for overnight bus parking is supported, as the potential for noise generation was an important concern for local residents.
- A general reduction in the number of buildings proposed is appropriate on this site outside the settlement boundary.
- A reduction in the overall site area from 13ha to 10ha is a positive step, although further clarity is required on why such a large area would be required in this location.
- Provision of a new access road linking to the wharf to reduce disturbance to residents is supported in principle, however, no preliminary environmental information is to demonstrate that this would be an effective mitigation measure.

While acknowledging that these are improvements to the Stage 2 proposals, there remain areas of concern:

- There is a lack of information or clarity on whether the storage area would be used for road-borne freight in addition to water-borne freight arriving at the wharf. As set out in the Draft HPC SPD, the Councils preferred approach will be to limit the overall size of the storage area to the minimum necessary to service the wharf, in accordance with local development policies that seek to limit development on greenfield sites outside the settlement boundary.
- Comwich is the only associated development site where construction working hours are specified. A proposal to limit unloading of barges to between 7.30am and 6.30pm represents a slight increase in hours of operation from Stage 2, but within the timeframe set out in the Draft HPC SPD. What remains a concern is the movement of barges at any time and operational hours for the laydown/storage area of 6.30am to 10.00pm. SDC will seek to limit operational hours to protect residential amenity and would welcome further dialogue with EDFE on this matter.
- The number of tides used by EDFE would remain unrestricted, with implications for residential amenity and continued leisure use of the wharf. The Proposed Changes do not set out any steps that would allow for continued leisure use of the Pill.
- The storage area is located in the functional floodplain of the River Parrett and no sequential approach has been provided to demonstrate that the Comwich site is the most appropriate site for the purpose. A detailed Flood Risk Assessment demonstrating there would be no increase to the risk of flooding in accordance with Local Plan policy CNE15 and emerging Core Strategy policy D1 should also be provided.
- Impacts of changes to the wharf and the wider flood defences in the area as exacerbating direct and cumulative flood risk to the village.

SDC acknowledge that use of Comwich Wharf could form an important element of a transport strategy for the HPC project that accord with emerging Core Strategy policies MIP2 and D9, helping to reduce the number of vehicles travelling through Bridgwater and Cannington to Hinkley Point. However, the Council considers that for the proposals to be supported, they must form part of a

well evidenced and robust transport strategy and investment package, the details of which have yet to be provided.

As set out in the Draft HPC SPD, a sequential approach to site selection combining flood risk, employment land policy, environmental factors and transport considerations should be undertaken to identify alternative locations and options for reducing impacts at Comwich. These should include:

- Use of the temporary jetty at the main site for a greater proportion of water-borne construction goods deliveries; and
- Siting of logistics and distribution uses on previously developed land at Hinkley Point and Bridgwater.

9.6.3.2 Design and Environmental Factors

With respect to the design of the facilities at Comwich, it is considered that the proposals are materially unchanged, with the exception of the reduction in site area. Comments on design matters are as follows:

- Very limited information is provided on landscaping to demonstrate that the storage area would be adequately screened from the River Parrett Trail or C182. Impacts on views from elevated vantage points at Horn Hill (Cannington Park) and the Quantocks are expected to be unavoidable, other than through reduction of the area of storage.
- The provision of a drainage channel to the River Parrett is noted. The role this will play would need to be evidence through a detailed Flood Risk Assessment.

9.6.3.3 Legacy Use

With respect to the legacy of the site, the Proposed Changes advise that the laydown area would be removed after the construction of HPC and that the land would be restored to a greenfield site. As set out in the Councils' Stage 2 response and Draft HPC SPD, this approach is supported as the basic position, with only flood risk management and planting to be retained where appropriate.

Through the process of preparing the HPC SPD, the Council is currently exploring with the Parish Council and local residents whether alternative legacy uses would be appropriate in this location.

9.6.4 Consistency with EDFE Supporting Information

The Draft Overview of Associated Development Construction (Feb 2011) provides only brief details of construction sequencing.

A number of statements in the Draft Freight Management Strategy are of particular interest in the relation to the Comwich proposals:

- Para. 6.3.8 states that 'analysis indicates that during normal demand periods there will be opportunities for other bulk cargos to be imported via the [temporary] jetty. Such cargos would require craneage for offloading and vehicles to transport the cargo to shore, which are proposed as part of the jetty design. Materials include unitised and pre-fabricated construction materials,

such as concrete and pipe units, steel reinforcing bars, cabling, ducting etc.’ The Councils would support an approach whereby use of the temporary jetty is maximised, allowing for a reduction of freight movements to Comwich Wharf.

- Para. 6.3.19 advises that ‘the primary function of the wharf facility at Comwich is to serve the delivery of the largest AILs’. Use of Comwich for this purpose is supported by SDC in principle. The Council seeks to limit the secondary purpose of the wharf (as proposed by EDFE) for the import of other construction-related goods, which could result in unacceptable intensification of use of the wharf and related impacts on residential amenity.
- Para. 6.3.30 advises that ‘stacking of containers would be limited to two in height to limit the visual impact. Maximum container height would be approximately 2.6m each...’ Although this position is not confirmed in the Proposed Changes document, the Council would seek to limit the stacking of containers through condition. While a combined height of 5.2m is considered an improvement to the 12m high storage building proposed at Stage 2, the containers could be spread over a far greater area with significant landscape impact resulting.

9.7 Cannington Bypass

9.7.1 Summary of Key Changes

Proposed changes to the Cannington Bypass relate to alterations to crossing arrangements, minor changes to the alignment of the road and environmental mitigation measures. Comments on these alterations are provided below, however it is noted that the Proposed Changes document does not explain why certain changes are proposed and provides only very limited information. The bypass map at Figure 32 is very small, making it difficult to see the detail of the proposals.

There is no consideration of alternative alignments for the bypass.

9.7.2 Policy and Guidance

Both Government advice, as set out in Guidance on Transport Assessment, and the Draft HPC SPD, require any new highway proposals to be justified by a New Approach to Appraisal (NATA) assessment. No such assessment is provided.

A Cannington Bypass is not part of any highway authority programme and therefore its justification must be based on the impact of HPC project traffic. No assessment of alternatives, as required by NATA, has been provided.

9.7.3 Councils' Response

9.7.3.1 Principle of Development

A full justification in accordance with NATA, with assessment of alternatives considered, is required.

In terms of minimising the impact of the HPC project on residents of Cannington and other user groups in Cannington, the rationale for providing a Cannington Bypass is understood. However, without a full and robust assessment of alternatives it is not possible to say whether the scheme presented represents the best means of alleviating traffic impact in Cannington.

In terms of responding to comments raised in the Stage 2 proposals, the proposals represent a slight improvement. However, this is subject to the major caveat that the justification presented is inadequate in terms of a NATA assessment. An assessment should include alternatives, including alternative Cannington Bypass alignments and the provision of a Bridgwater Northern Bypass. This means that it is not possible to support the specific proposals for Cannington Bypass.

9.7.3.2 Design and Environmental Factors

Proposed changes to the Cannington Bypass are set out below, with a response by SDC:

- ‘The underpass at the southern end of the proposed bypass will be replaced by a controlled crossing which will be used by pedestrians and for cattle.’ Although a controlled crossing is considered a better option to the alternative of an underpass, significant concerns remain about the severance effect the bypass would have on the operations of Brymore School. Alternative alignments for the bypass should be assessed in full to understand whether a route cutting across the school avenue can be avoided.
- ‘The traffic light controlled pedestrian crossing will be at a more convenient location further to the south.’ It is expected that this change seeks to allow the pupils of Brymore School to cross on the route of the school avenue, rather than needing to walk along the bypass and access the school via Withiel Farm. The routes taken by cattle and pupils are not clear on the map provided but it is stated that the same crossing point would be utilised. It is understood that the school prefers to keep the main avenue and agricultural uses separate, which would not be achieved by the design set out in the Proposed Changes.
- ‘Noise from the road will be limited by embankments instead of fencing, which are more in keeping with the rural character of the area.’ No information is provided on the height of embankments or the relative effectiveness of these compared to acoustic barrier fences in terms of noise reduction. Additional drawings and preliminary environmental information on this matter would be useful.
- ‘Inclusion of field and farm access points for Withiel Farm, Brymore School, Hensfield Farm and Quarry Land.’ Alterations to ensure access to farms and continuation of agricultural operations are support in principle by SDC, subject to the agreement of details with farm operators.
- ‘An underpass for badgers, together with an ecologically friendly pond, will be built on the northern part of the bypass.’ Alterations to reduce ecological impacts and provide enhancements are support in principle, subject to the provision of an environmental assessment demonstrating that the proposals are adequate and appropriate.
- ‘The route has been slightly realigned to allow retention of the existing pond, trees and other landscaping features.’ Alterations to reduce ecological impacts and provide enhancements are support in principle, subject to the provision of

an environmental assessment demonstrating that the proposals are adequate and appropriate.

- 'The width of the footway/cycleway has been reduced, in response to comments from statutory consultees that this would reduce the perception of space and in turn reduce speed on the roads.' In addition to the provision of a footway/cycleway, EDFE should provide alternative footpath and cycle routes along popular routes that would prevent the need for pedestrians and cyclist to have to travel long distances along the bypass.
- 'Withiel Drive will be blocked to vehicles, following residents' concerns about a busy transport link or 'rat run' being unwittingly created.' SDC support the principle of alterations that address residents concerns and help to protect residential amenity.
- 'Sandy Lane and Chads Hill have been realigned so that traffic can be maintained along both roads at all times during construction.' Alterations to maintain access are supported in principle, but the nature of the proposed changes are not clear from the very limited information provided.

9.7.3.3 Legacy Use

A Cannington Bypass could provide a legacy in terms of reduced traffic flows in Cannington Village. A full NATA assessment is required to assess the long term benefits in Cannington and any disbenefits which result from the bypass so that a judgement can be made on the need for the bypass.

9.7.4 Consistency with EDFE Supporting Information

No direct justification for the bypass is presented in EDFE's supporting information.

9.8 Bridgwater Bypass

The Proposed Changes document confirms the conclusions of the Stage 2 consultation that the Bridgwater Northern Bypass is not necessary to mitigate the impact of HPC project construction traffic, nor the long term operation of the power station. However, no objective assessment in line with the requirements of the Department for Transport's New Approach to Appraisal (NATA) is provided, as has been requested by Somerset County Council and the District Councils.

The Councils cannot understand how such a strong statement can be made without the technical evidence. This matter has been raised for over 2 years as a fundamental issue. The lack of progress to date has given rise to an acute time pressure which creates risk in the project, and this could have been avoided if a more strategic approach was taken at the outset.

The following reasons are given for not taking the bypass proposals further, to which the Councils have provided a response:

- The land over which the bypass would run is environmentally sensitive. This may be the case, but this is only one factor which needs to be taken into account in assessing the environmental impact of the scheme and taking a balanced view. The assessment should also take account of, inter alia,

environmental impacts on roads relieved of traffic and the impacts in the centre of Bridgwater and Cannington.

- The land lies in the floodplain and therefore should not be developed unless there are compelling reasons to do so. Again, this statement cannot be agreed without the full assessment. The EDFE Proposed Changes documents include other developments (notably at M5 Junction 23 and Combswich) located in the floodplain, where a full Flood Risk Assessment is requested.
- EDFE state that Government Policy is clearly against building new roads and strongly prefers the adoption of strategies to manage traffic and to encourage the use of other means of transport. This is true, but road building is permitted if the other strategies are not effective. As yet EDFE have not demonstrated that their transport strategy and mitigation measures are a more effective means of reducing transport impacts. The national policy statement makes a case for national infrastructure and this could provide sufficient justification to enable the delivery of the station.
- A bypass would attract more traffic to the immediate Hinkley vicinity, thereby transferring parking pressure to the more sensitive rural environment around the site. Parking in the rural areas can be controlled if necessary. The visitor centre is planned to generate 250,000 visitors per annum so this argument is flawed.
- The road would take too long to design and build. No timetable for design and construction is given and queries were raised during the Stage 2 consultation as to whether the timescales given at that time were reasonable. In any event, the road could have longer term benefits during the operational stage. The deliverability of all the road and junction improvements in Bridgwater is yet to be tested.

In summary, there is no objective evidence presented as to whether EDFE's proposed transport strategy will be effective in mitigating the effects of HPC project traffic during construction and operation, or if a Bridgwater Bypass would provide a more effective solution.

9.9 Highway Improvements

9.9.1 Summary of Key Changes

Two types of highway improvements are presented by EDFE in the Proposed Changes:

- Improvements to mitigate the specific traffic impact of the HPC project.
- Improvements as a result of concerns raised by the community. These are stated to be provided as a community benefit rather than to address any traffic impact of the HPC project.

In the Stage 2 proposals the only highway scheme proposed was the Cannington Bypass, though the Transport Appraisal made reference to a package of '...more minor mitigation measures...within the urban areas of Bridgwater and Cannington.' The identification of highway interventions is viewed as a positive step, although, as highlighted elsewhere in this report, the lack of detailed

transport assessment means that a credible transport strategy remains to be provided.

9.9.1.1 Highway Improvements to Mitigate Traffic Impact

The following improvements to mitigate traffic impact are identified:

- A39 Broadway/A38 Taunton Road Junction
- A38 Bristol Road/Wylds Road Junction
- Wylds Road/The Drove Junction
- Northern Distributor Road/Chilton Street Junction
- Cross Rifles (Cannon) Roundabout
- A39 Bath Road bus priority measures
- M5 Junction 23 Signalisation
- M5 Junction 24 Partial Signalisation.

In general the junction improvements relate to the operation of signal control rather than physical improvements. No details have been received of the improvements proposed and no assessment presented of the need for and impact of the improvements.

9.9.1.2 Improvements with a Community Benefit

The following improvements resulting from community consultation are identified:

- A39 New Road/B3339 Sandford Hill Junction – provision of roundabout
- A39 Washford Cross – provision of Roundabout
- Cannington traffic calming
- C182 Farrington Hill Lane horse crossing
- C182 parking controls
- Junction improvements at Claylands corner.
- Junction improvements at the Shurton turn.

Again, no plans or assessment of these improvements have been provided. During community consultation events, the need for further potential junction improvements along the C182 have been identified, such as at the Combwich turning.

9.9.2 Councils' Response

Whilst some of the schemes proposed coincide with schemes identified in the Somerset County Council and district Council plans and strategies (see section 9.1.2), no analysis has been provided of: the Baseline (no HPC project) traffic conditions (in terms of queues and delays), the conditions with HPC project but

no mitigation; or the conditions following improvement. This, together with the lack of information on specific plans for each proposed improvements make it impossible to assess whether:

1. All locations requiring improvements have been identified
2. The locations proposed actually need improvement
3. The improvements proposed are effective in mitigating problems
4. The improvements proposed may have implication for other areas of the highway network.

The improvements proposed are generally highway capacity related. Other than for Bath Road, there are no improvements to public transport identified and no specified improvements to walking and cycling routes to improve accessibility of the accommodation campuses and reduce the severance effects of the highway network for movements by cycle and on foot.

The transport network does need to be considered as a system and the performance of the 'links' also needs to be taken into account.

At Stage 2, it was identified that a full assessment of Bridgwater Northern Bypass is required, with a comparison carried out of the alternative of providing improvements in Bridgwater. This assessment has not taken place (or if it has the results have not been presented to the highway authorities). As identified above, there is therefore no evidence base on which to assess the statements in the consultation that environmental and programming matters mean that a bypass should not be built.

9.10 Cycle Improvements

The Proposed Changes document includes a brief statement that EDFE are working with Somerset County Council to develop proposals to enhance cycle facilities, particularly near the Park & Ride sites and accommodation campuses. The district Councils support and welcome this statement, but are disappointed that specific proposals will not be subject to formal consultation, based on EDFE's current work programme.

The strategy and policy documents identified in section 9.1.2 of this report identify a series of cycle, pedestrian and related public realm enhancements that provide a starting point for the identification of relevant routes. WSC and SDC will welcome the opportunity for dialogue with EDFE and Somerset County Council on which schemes relate to the HPC project in terms of impact mitigation and compensation.

In the Proposed Changes document, EDFE advise that cycle improvements '...will be within the highway boundary and comprise enhanced cycle routes and crossing points.' The district Councils do not accept that cycle improvements should be limited to the existing highway boundary or Public Rights of Way, as this could result in highly compromised proposals that do not achieve the objectives set out for them. Route definition will need to take account of land ownership constraints, but these should not be considered the determining factor from the outset, whether improvements are delivered by EDFE, the County Council, district Councils or a third party.

Proposals for improved cycle provision at Bridgwater Station are a positive step, but must be considered in relation to the wider cycle infrastructure and need for improvements in Bridgwater.

10 Hinkley Point C Main Site Proposals

10.1 Proposed Changes to Main Site Proposals

10.1.1 Summary of Key Changes

The text below summarises key material changes that are now proposed for the main site:

- EDFE has provided further details in relation to the phasing of landscaping plans proposed close to the southern boundary.
- The proposal for the on-site accommodation campus has been reduced from 700 (Stage 2) to 510 (Proposed Changes). A reduction of 190 bedspaces.
- Junction details for the emergency access road near the southern boundary with Shurton have been set out.
- It is proposed that permission for the National Grid towers (pylons) and wires (downleads) on HPC land will now be applied for by National Grid directly, rather than by EDFE Energy. It should be noted that proposals for the National Grid 400kV substation will remain within EDFE Energy's application.
- Changes have been made to the overall site boundary.
- The temporary jetty proposed in Stage 2 has been removed from Proposed Changes and EDFE are proposing that it will not form part of the Development Consent Order (DCO) applications. An application for a temporary jetty is currently being determined by the Marine Management Organisation (MMO).
- A system for returning fish to the sea will be included in the design of the power station.

10.1.2 Policy and Guidance

The proposed HPC site falls outside the development boundary of any established settlement and as such would be considered contrary to local plan policy. Development in this instance would only be permissible where the development would result in benefit both economic and social activity in the locality.

WSC and SDC accept that the principle for the new nuclear power station is driven at the national level as Hinkley Point has been identified as a location which is suitable for the deployment of a new nuclear facility. Any decision for such development is not under the control of the Council and will be decided by the IPC (or successor body).

10.1.3 Councils' Response

With regards to the proposed on-site campus, the reduction in bedspaces from 700 to 510 (a reduction of 190 bedspaces) is considered a minor improvement, but WSC and SDC remain concerned about the impact such a significant increase in population could have on local villages and hamlets. A response on the campus proposal is provided in Chapter 6.

In addition to the proposed changes to the on-site accommodation campus (covered above), EDFE set out a number of amendments to the main site proposals.

Early Restoration of the Southern Area – WSC have previously raised concerns about the adequacy of the landscape buffer at the southern part of the site and a commitment to early implementation is considered an improvement to the phasing of works.

National Grid Services – It is noted that HPC project related proposals for three end (terminal) towers (pylons) and connection wires will now be incorporated in the DCO application by National Grid rather than the HPC project DCO application. Nevertheless, the cumulative impacts of the two applications will be an important consideration and a coordinated approach to the presentation of proposals and consultation by EDFE and National Grid will be expected.

Emergency Access Road – The provision of additional details on the emergency access junction is useful and the commitment that the route would only be used to respond to an incident at the station is important. Given that hedgerow removal is proposed, details of replacement boundary treatments that would maintain visibility splays and be appropriate to the setting are required.

Fish Recovery and Return (FRR) for Hinkley Point C - It is noted that a FRR system is proposed and further preliminary environmental information and design will be required before the Councils can comment further.

Extreme Rainfall Storage Provision – The provision of flood risk management infrastructure to cope with 1 in 10,000 rainfall events will provide reassurance about the safety of the station in extreme events. A full Flood Risk Assessment and scheme design will be required before the Councils can comment further.

10.1.4 Legacy Use

Insufficient information is available within the Consultation: Update on and Proposed Changes to 'Preferred Proposals' Document to confirm whether valuable and sustainable legacy uses could be provided post construction. The principle of permanent development associated with the temporary accommodation campus would not be supported, and the position of West Somerset Council is that the site would need to be restored for agricultural or suitable community use immediately following the cessation of use as a construction site. The provision and retention of the landscaping is supported and the Council will wish to consult the local community on appropriate legacy uses of the campus site that are appropriate to the rural setting. These might include:

- integrating the public rights of way (PROW) with the visitor centre proposal (outlined in the Stage 2 consultation);

- establishment of Community woodland which would address the Council's green infrastructure objectives through their respective emerging Core Strategies; and
- improvements in the wider area and proposals associated with the Steart Coastal Management Project.

10.2 Stage 2 Issues Not Addressed

- The red line site boundary (as proposed within Proposed Changes) is not considered to be the appropriate extent of a landscape scheme for Hinkley Point C.
- The provision of landscaping between the construction campus and nearby settlements is welcomed and viewed by the councils as an essential mitigation measure. It should be reiterated that landscaping in this location is considered to be mitigation, and not a compensation or legacy benefit.

Appendix A

The Dillington Visions

A1 Economic Development

To ensure that the HPC development acts as a key driver for the achievement of a more dynamic, entrepreneurial, inclusive and sustainable economy in Somerset and the wider region.

Priorities for the vision:

- accelerate the move to a high value, knowledge based economy, including the growth of an emerging energy, environment and related technology business cluster;
- support a growing, highly skilled workforce which can underpin a more competitive and productive business base;
- provide opportunities and benefits for all communities, helping to narrow inequalities and target deprivation and worklessness;
- recognise the value of the natural environment and maintain the County's positive image as a visitor and investment destination.

A2 Developing a Low Carbon Future

To develop Somerset as a centre of excellence for low carbon use, with a strong business and educational reputation for low carbon and environmental technologies.

Priorities for the vision:

- Developing low carbon skills training in Somerset and creating a 'green collar' workforce;
- Developing a national reputation for Somerset as a centre of excellence for low carbon energy and resource management;
- Developing a reputation as a centre of excellence in flood management and securing appropriate solutions for coastal flood management and the risk of tidal surge along the Somerset coast
- Building upon Somerset's existing reputation for excellence in waste management through securing appropriate and modern management solutions for waste from the nuclear new build that deliver environmental and economic benefits;
- Building upon EDF's existing programmes to support homes and businesses to be low carbon;
- Investigating the use of waste heat from the nuclear new build development to support sustainable business development.

A3 Education, Employment and Skills

To ensure the HPC development maximises employment and skills opportunities for local people, whilst inspiring young people to achieve and seek to follow careers in the science, technology, engineering and manufacturing sectors.

Priorities for the vision:

- To invest in education initiatives which will raise the aspirations of the young people in West Somerset, Sedgemoor and across the County to improve retention and increase participation;
- To provide timely information on the workforce and their families, to support the management of any increase in the pupil population and impact linked to the HPC project;
- To establish an employment brokerage that opens up access to employment opportunities to local people;
- To support our community partners to tackle worklessness, by together, providing pathways that provide opportunities for skilling, which lead to sustainable employment;
- To create a future workforce through the provision of apprenticeships and training opportunities in the construction supply chain;
- To ensure that our supply chain partners recruit, train and inspire local people.

A4 Community Wellbeing

To generate community cohesion and support the delivery of strategic objectives by implementing a comprehensive scheme of community wellbeing and safety measures, that take account of the needs of the communities of West Somerset, Sedgemoor and Somerset as a whole, as well as the needs and impacts of the HPC workforce.

Priorities for the vision:

- A comprehensive package of preventative measures to encourage social cohesion and minimise crime and disorder, and make a positive contribution to high quality cultural, leisure and religious facilities, services and/or partnerships;
- Adequate resilience and emergency service resources provided to cover the potential for increased incidents at the HPC site, and the transport network and in towns and villages hosting workers;
- A holistic approach to community health and wellbeing, including preventative and responsive measures to improve the environment, provide opportunities for a healthy lifestyle, and support the delivery of high quality health care;
- To engage the community in the design, development and delivery of facilities, services and/or partnerships.

A5 Housing

To ensure that the Hinkley C development provides housing solutions that enable workers and their families to integrate into the community and are economically active at a local level, whilst making a positive contribution to the Councils' Housing Strategies and their wider strategic planning objectives.

Priorities for the Vision: To sensitively design and manage any on-site campus so that it has sustainable links into and with the community.

- To work together to ensure effective local delivery of our shared aims to meet local and EDF housing needs, using the full suite of powers to enable delivery e.g. CPO.
- To minimise the risk of local people being disadvantaged as a result of NNB, through robust mitigation proposals for the housing sector to maintain the current and planned affordable housing stock level and minimise impact on housing support services and voluntary advice services. Or Ensuring the development does not adversely impact on the availability or affordability of housing and accommodation for the local community.
- Work together to promote opportunities and leave a housing legacy that meets the needs of local people in a range of tenures that they can afford and in a way that supports rural sustainability. To promote and deliver housing solutions that are to the agreed environmental and safety standards. Town centre regeneration objectives will shape Hinkley C accommodation and associated strategies.